Jeorgia Department of Natural Hesources

2 Martin Luther King, Jr. Drive, S.E., Suite 1152 East Tower, Atlanta, Georgia 30334-9000 Chris Clark, Commissioner F. Allen Barnes, Director Environmental Protection Division 404/656-4713

April 14, 2010

Mr. John Waite, Environmental Manager Department of Utility Services City of Valdosta Post Office Box 1125 Valdosta, Georgia 31603

RE: City of Valdosta – Withlacoochee

Water Pollution Control Plant NPDES Permit No. GA0033235

Dear Mr. Waite:

Pursuant to the Georgia Water Quality Control Act, as amended; the Federal Water Pollution Control Act, as amended; and the Rules and Regulations promulgated thereunder, we have today issued the attached National Pollutant Discharge Elimination System (NPDES) permit for the referenced water pollution control plant.

Please be advised that on and after the effective date indicated in the attached NPDES permit, the permittee must comply with all the terms, conditions and limitations of this permit.

Sincerely,

F. Allen Barnes

Director

FAB/jrb

**ATTACHMENT** 

PERMIT NO. GA0033235

# STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION

# AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the "State Act"; the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the "Federal Act"; and the Rules and Regulations promulgated pursuant to each of these Acts,

City of Valdosta – Withlacoochee Water Pollution Control Plant Post Office Box 1125 / Valdosta, Georgia 31603

is authorized to discharge from a facility located at

3352 Wetherington Lane Valdosta, Georgia (Lowndes County)

to receiving waters

Withlacoochee River tributary to the Suwannee River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, III and IV hereof.

This permit shall become effective on April 14, 2010.

This permit and the authorization to discharge shall expire at midnight, April 13, 2015.

Signed this 14<sup>th</sup> day of April, 2010.

Director,

**Environmental Protection Division** 

# STATE OF GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION

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# **PARTI**

EPD is the Environmental Protection Division of the Department of Natural Resources.

The Federal Act referred to is The Clean Water Act.

The State Act referred to is The Water Quality Control Act (Act No. 870).

The State Rules referred to are The Rules and Regulations for Water Quality Control (Chapter 391-3-6).

#### A. SPECIAL CONDITIONS

#### 1. MONITORING

The concentration of pollutants in the discharge will be limited as indicated by the table(s) labeled "Effluent Limitations and Monitoring Requirements." The effluent shall meet the requirements in the table(s) or the condition in paragraph I.A.1.a., whichever yields the higher quality effluent.

- a. For 5 day biochemical oxygen demand (BOD<sub>5</sub>) and total suspended solids (TSS), the arithmetic mean of the values of the effluent samples collected during a month shall not exceed 15 percent of the arithmetic mean of values for influent samples collected at approximately the same times (85 percent removal). For water pollution control plants followed by a polishing pond or consisting of a waste stabilization pond, the 85 percent removal for TSS is not applicable.
- b. The monthly average, other than for fecal coliform bacteria, is the arithmetic mean of values obtained for samples collected during a calendar month.
- c. The weekly average, other than for fecal coliform bacteria, is the arithmetic mean of values obtained for samples collected during a 7 day period. The week begins 12:00 midnight Saturday and ends at 12:00 midnight the following Saturday. To define a different starting time for the sampling period, the permittee must notify the EPD in writing. For reporting required by I.C.2. of this permit, a week that starts in one month and ends in another month shall be considered part of the second month. The permittee may calculate and report the weekly average as a 7 day moving average.
- d. Fecal coliform bacteria will be reported as the geometric mean of the values for the samples collected during the time periods in I.A.1.b. and I.A.1.c.
- e. Untreated wastewater influent samples required by I.B. shall be collected before any return or recycle flows. These flows include returned activated sludge, supernatants, centrates, filtrates, and backwash.
- f. Effluent samples required by I.B. of this permit shall be collected after the final treatment process and before discharge to receiving waters. Composite samples may be collected before chlorination with written EPD approval.
- g. A composite sample shall consist of a minimum of 13 subsamples collected at least once every 2 hours for at least 24 hours and shall be composited proportionately to flow.
- h. Flow measurements shall be conducted using the flow measuring device(s) in accordance with the approved design of the facility. If instantaneous measurements are required, then the permittee shall have a primary flow measuring device that is correctly installed and

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maintained. If continuous recording measurements are required, then flow measurements must be made using continuous recording equipment. Calibration shall be maintained of the continuous recording instrumentation to  $\pm 10\%$  of the actual flow.

Flow shall be measured manually to check the flow meter calibration at a frequency of once a month. If secondary flow instruments are in use and malfunction or fail to maintain calibration as required, the flow shall be computed from manual measurements or by other method(s) approved by EPD until such time as the secondary flow instrument is repaired. For facilities which utilize alternate technologies for measuring flow, the flow measurement device must be calibrated semi-annually by qualified personnel.

Records of the calibration checks shall be maintained.

- If secondary flow instruments malfunction or fail to maintain calibration as required in I.A.1.h., the flow shall be computed from manual measurements taken at the times specified for the collection of composite samples.
- j. Quarterly analyses required in I.B. shall be performed in March, June, September, and December. Analyses required twice per year will be performed in June and December. Analyses required annually will be performed in June.
- k. Some parameters must be analyzed to the detection limits specified by the EPD. These parameters will be reported as "not detected" when they are below the detection limit and will then be considered in compliance with the effluent limit. The detection limit will also be reported.

### 2. SLUDGE DISPOSAL REQUIREMENTS

Sludge shall be disposed of according to the regulations and guidelines established by the EPD and the Federal Act section 405(d) and (e), and the Resource Conservation and Recovery Act (RCRA). In land applying nonhazardous municipal sewage sludge, the permittee shall comply with the general criteria outlined in the most current version of the EPD "Guidelines for Land Application of Sewage Sludge (Biosolids) at Agronomic Rates" and with the State Rules, Chapter 391-3-6-.17. Before disposing of municipal sewage sludge by land application or any method other than co-disposal in a permitted sanitary landfill, the permittee shall submit a sludge management plan to EPD for written approval. This plan will become a part of the NPDES Permit after approval and modification of the permit. The permittee shall notify the EPD of any changes planned in an approved sludge management plan.

If an applicable management practice or numerical limitation for pollutants in sewage sludge is promulgated under Section 405(d) of the Federal Act after approval of the plan, then the plan shall be modified to conform with the new regulations.

#### 3. SLUDGE MONITORING REQUIREMENTS

The permittee shall develop and implement procedures to ensure adequate year-round sludge disposal. The permittee shall monitor and maintain records documenting the quantity of sludge removed from the facility. Records shall be maintained documenting that the quantity of solids removed from the facility equals the solids generated on an average day. The total quantity of sludge removed from the facility during the reporting period shall be reported each month with the Discharge Monitoring Reports as required under Part I.C.2.of this permit. The quantity shall be reported on a dry weight basis.

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Pond treatment systems are required to report the total quantity of sludge removed from the facility only during the months that sludge is removed.

4. INTRODUCTION OF POLLUTANTS INTO THE PUBLICLY OWNED TREATMENT WORKS (POTW)

The permittee must notify EPD of:

- Any new introduction of pollutants into the POTW from an indirect discharger that would be subject to Sections 301 or 306 of the Federal Act if the pollutants were directly discharged to a receiving stream; and
- b. Any substantial change in the volume or character of pollutants from a source that existed when the permit was issued.

This notice shall include information on the quality and quantity of the indirect discharge introduced and any anticipated impact on the quantity or quality of effluent to be discharged from the POTW.

# 5. EFFLUENT TOXICITY AND BIOMONITORING REQUIREMENTS

The permittee shall comply with effluent standards or prohibitions established by Section 307(a) of the Federal Act and with Chapter 391-3-6-.03(5) of the State Rules and may not discharge toxic pollutants in concentrations or combinations that are harmful to humans, animals, or aquatic life.

If toxicity is suspected in the effluent, the EPD may require the permittee to perform any of the following actions:

- Acute biomonitoring tests;
- b. Chronic biomonitoring tests;
- c. Stream studies;
- d. Priority pollutant analyses;
- e. Toxicity reduction evaluations (TRE); or
- f. Any other appropriate study.

The EPD will specify the requirements and methodologies for performing any of these tests or studies. Unless other concentrations are specified by the EPD, the critical concentration used to determine toxicity in biomonitoring tests will be the effluent instream wastewater concentration (IWC) based on the permitted monthly average flow of the facility and the critical low flow of the receiving stream (7Q10). The endpoints that will be reported are the effluent concentration that is lethal to 50% of the test organisms (LC50) if the test is for acute toxicity, and the no observed effect concentration (NOEC) of effluent if the test is for chronic toxicity.

The permittee must eliminate effluent toxicity and supply the EPD with data and evidence to confirm toxicity elimination.

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# B. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The discharge from the water pollution control plant shall be limited and monitored by the permittee as during the months of January through April for 12 MGD design capacity:

Parameter	Discharge L mg/L (k unless otherw	g/day)	Mon	itoring Requirements			
	Monthly Avg.	Weekly Avg.	Measurement Frequency	Sample Type	Sample Location		
Flow-m <sup>3</sup> /day (MGD)	45420 (12.0)	56775 (15.0)	Seven/Week	Continuous Recording	Effluent		
Biochemical Oxygen Demand (5-day) January February – April	15.0 (682) 30.0 (1365)	22.5 (853) 45.0 (1706)	Five/Week	Composite	Influent & Effluent		
Total Suspended Solids (TSS)	30 (1365)	45 (1706)	Five/Week	Composite	Influent & Effluent		
Fecal Coliform Bacteria (#/100 mL)	200/100	400/100	Three/Week	Grab	Effluent		
Ammonia (as N)	17.4 (792)	26.1 (989)	Five/Week	Composite .	Effluent		
Total Residual Chlorine (TRC)	0.04*	0.04 *	Seven/Week	Grab	Effluent		
Total Phosphorus (as P)	Report	NA (NA)	Five/Week	Composite	Effluent		
Ortho-Phosphorus (as P)	Report	NA (NA)	Five/Week	Composite	Effluent		
Nitrite-Nitrate (as N)	Report	NA (NA)	Five/Week	Composite	Effluent		

The pH shall not be less than 6.0 standard units or greater than 9.0 standard units and shall be monitored on the final effluent by analyzing grab samples taken seven days per week.

The minimum effluent dissolved oxygen shall be 5.0 mg/L or higher and shall be monitored on the final effluent by analyzing grab samples taken seven days per week.

<sup>\*</sup> This is a daily maximum limitation for TRC and shall be analyzed to the specific detection limit of 0.05 mg/L.

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# B. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont.)

The disc harge from the water pollution control plant shall be limited and monitored by the permittee as during the month of May for 10 MGD design capacity:

.Parameter	Discharge L mg/L (k unless otherw	g/day)	Monitoring Requirements			
	Monthly Avg.	Weekly Avg.	Measurement Frequency	Sample Type	Sample Location	
Flow-m <sup>3</sup> /day (MGD)	37850 (10.0)	47313 (12.5)	Seven/Week	Continuous Recording	Effluent	
Biochemical Oxygen Demand (5-day)	12.0 (455)	18.0 (569)	Five/Week	Composite	Influent & Effluent	
Total Suspended Solids (TSS)	30 (1137)	45 (1422)	Five/Week	Composite	Influent & Effluent	
Fecal Coliform Bacteria (#/100 mL)	200/100	400/100	Three/Week	Grab	Effluent	
Ammonia (as N)	4.3 (163)	6.4 (204)	Five/Week	Composite	Effluent	
Total Residual Chlorine (TRC)	0.04 *	0.04 *	Seven/Week	Grab	Effluent	
Total Phosphorus (as P)	Report	NA (NA)	Five/Week	Composite	Effluent	
Ortho-Phosphorus (as P)	Report	NA (NA)	Five/Week	Composite	Effluent	
Nitrite – Nitrate (as N)	Report	NA (NA)	Five/Week	Composite	Effluent	

The pH shall not be less than 6.0 standard units or greater than 9.0 standard units and shall be monitored on the final effluent by analyzing grab samples taken seven days per week.

The minimum effluent dissolved oxygen shall be 7.0 mg/L or higher and shall be monitored on the final effluent by analyzing grab samples taken seven days per week.

<sup>\*</sup> This is a daily maximum limitation for TRC and shall be analyzed to the specific detection limit of 0.05 mg/L.

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# B. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont.)

The discharge from the water pollution control plant shall be limited and monitored by the permittee as during the months of June through December for 8 MGD design capacity:

Parameter	Discharge L mg/L (kg unless otherwi	g/day)	Monitoring Requirements				
	Monthly Avg.	Weekly Avg.	Measurement Frequency	Sample Type	Sample Location		
Flow-m³/day (MGD)	30208 (8.0)	37850 (10.0)	Seven/Week	Continuous Recording	Effluent		
Biochemical Oxygen Demand (5-day) June July – August Sept. – Oct. November December	7.0 (212) 10.0 (303) 4.0 (121) 7.0 (212) 10.0 (303)	10.5 (265) 15.0 (379) 6.0 (152) 10.5 (265) 15.0 (379)	Five/Week	Composite	Influent & Effluent		
Total Suspended Solids (TSS)	30 (910)	45 (1137)	Five/Week	Composite	Influent & Effluent		
Fecal Coliform Bacteria (#/100 mL)	200/100	400/100	Three/Week	Grab	Effluent		
Ammonia (as N)	2.0 (61)	3.0 (76)	Five/Week	Composite	Effluent		
Total Residual Chlorine (TRC)	0.018*	0.018 *	Seven/Week	Grab	Effluent		
Total Phosphorus (as P)	Report	NA (NA)	Five/Week	Composite	Effluent		
Ortho-Phosphorus (as P)	Report	NA (NA)	Five/Week	Composite	Effluent		
Nitrite Nitrate (as N)	Report	NA (NA)	Five/Week	Composite	Effluent		

The pH shall not be less than 6.0 standard units or greater than 9.0 standard units and shall be monitored on the final effluent by analyzing grab samples taken seven days per week.

The minimum effluent dissolved oxygen shall not be less than 7.0 mg/L (June and September through December) and 6.0 mg/L (July through August) and shall be monitored on the final effluent by analyzing grab samples taken seven days per week.

<sup>\*</sup> This is a daily maximum limitation for TRC and shall be analyzed to the specific detection limit of 0.05 mg/L.

# C. MONITORING AND REPORTING

# 1. REPRESENTATIVE SAMPLING

Samples and measurements of the monitored waste shall represent the volume and nature of the waste stream. The permittee shall maintain a written sampling and monitoring schedule.

# 2. REPORTING

All reports or information submitted in compliance with this permit or requested by EPD must be signed and certified by a principal executive officer, elected official, or other authorized representative in compliance with 40 CFR 122.22. Required analytical results obtained by the permittee shall be summarized on a Discharge Monitoring Report form and any additional EPD specified forms. Monitoring results shall be submitted to the EPD postmarked no later than the 15th day of the month following the end of the reporting period. The EPD may require in writing that additional monitoring results be reported. Signed copies of these and all other required reports shall be submitted to:

Environmental Protection Division Permitting, Compliance and Enforcement Program 4220 International Parkway, Suite 101 Atlatna, Georgia 30354

#### MONITORING PROCEDURES

Analytical procedures, sample containers, sample preservation techniques, and sample holding times must be consistent with the techniques and procedures listed in 40 CFR Part 136 for monitoring specified in I.B. EPA approved methods used must be applicable to the concentration ranges of the NPDES samples.

# 4. RECORDING OF RESULTS

For each required parameter analyzed, the permittee shall record:

- a. The exact place, date, and time of sampling, and the person(s) collecting the sample. For flow proportioned composite samples, this shall include the instantaneous flow and the corresponding volume of each sample aliquot, and other information relevant to document flow proportioning of composite samples;
- The dates and times the analyses were performed;
- The person(s) who performed the analyses;
- d. The analytical procedures or methods used; and
- The results of all required analyses.

#### ADDITIONAL MONITORING BY PERMITTEE

If the permittee monitors required parameters at the locations designated in I.B. more frequently than required, the permittee shall analyze all samples using approved analytical methods specified in I.C.3. The results of this additional monitoring shall be included in calculating and reporting the values on the Discharge Monitoring Report forms. The permittee shall indicate the monitoring

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frequency on the report. The EPD may require in writing more frequent monitoring, or monitoring of other pollutants not specified in this permit.

# 6. RECORDS RETENTION

The permittee shall retain records of:

- a. All laboratory analyses performed including sample data, quality control data, and standard curves;
- b. Calibration and maintenance records of laboratory instruments;
- c. Calibration and maintenance records and recordings from continuous recording instruments;
- Process control monitoring records;
- e. Facility operation and maintenance records;
- f. Copies of all reports required by this permit;
- g. All data and information used to complete the permit application; and
- All monitoring data related to sludge use and disposal.

These records shall be kept for at least three years. Sludge handling records must be kept for at least five years. Either period may be extended by EPD written notification.

#### 7. PENALTIES

Both the Federal and State Acts provide that any person who falsifies or tampers with any monitoring device or method required under this permit, or who makes any false statement, representation, or certification in any record submitted or required by this permit shall, if convicted, be purished by a fine or by imprisonment or by both. The Acts include procedures for imposing civil penalties for violations or for negligent or intentional failure or refusal to comply with any final or emergency order of the Director of the EPD. The permittee must comply with 40 CFR 122.41(i)(5).

#### 8. WATERSHED PROTECTION PLAN

The permittee has submitted a watershed protection plan and the plan is being reviewed by EPD. Once approved the watershed protection plan shall be enforceable through this permit.

The watershed protection plan should provide for the following:

- a. The watershed protection plan shall apply to all areas contained within the permittee's political boundaries and to any other areas to which the permittee provides sewer service. The plan will utilize the information generated in the permittee's watershed assessment to establish a baseline of watershed conditions and to provide ongoing long-term monitoring according to the approved plan to either verify that the plan is effective or to modify the plan such that water quality standards will be achieved.
- b. The watershed protection plan must include a schedule for correcting current water quality problems that are causing water quality standards violations. The permittee shall provide

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ongoing monitoring to verify that the actions taken to correct the water quality problems are effective.

- c. The permittee shall develop and put in place best management practices (BMPs) to prevent future water quality standards violations.
- d. The permittee shall provide ongoing monitoring to verify that the BMPs are working or to provide the information necessary to modify the BMPs to achieve water quality standards.

# Annual Report

Once approved, each June 30<sup>th</sup> the permittee is to submit the following to EPD:

- a. An annual certification statement documenting that the plan is being implemented as approved. The certification statement shall read as follows: "I certify, under penalty of law, that the watershed protection plan is being implemented. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
- b All watershed plan data collected during the previous year in an electronic format. This data shall be archived using a digital format such as a spreadsheet developed in coordination with EPD. All archived records, data, and information pertaining to the watershed protection plan shall be maintained permanently.
- c. A progress report that provides a summary of the BMPs that have been implemented and documented water quality improvements. The progress report shall also include any necessary changes to the Watershed Protection Plan.

#### LONG TERM BIOCHEMICAL OXYGEN DEMAND

The permittee shall perform a 120 day long term BOD test, once during the permit period. The test should be performed on an effluent sample collected during the critical period from May 1 through September 30. The results of this test should be provided to Georgia EPD prior to renewal of the permit.

#### 10. PRIORITY POLLUTANTS

The permittee must conduct one scan of the 129 priority pollutants during the first year of issuance of this permit. The priority pollutant scans must be measured at least to EPD detection limits. If substances are measured at levels of concern, then the permittee may be required to perform additional priority pollutant analyses or the permit may be modified to include effluent limitations for priority pollutants.

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# 11. CHRONIC WHOLE EFFLUENT TOXICITY

The permittee must conduct two Whole Effluent Toxicity (WET) tests within the first year of issuance of this permit, with the first test being conducted within 90 days of permit issuance. The testing must incorporate the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled "Short-Term Methods for Estimating the Chronic Toxicity of Effluent and Receiving Water to Freshwater Organisms", 4<sup>th</sup> Edition, WPA-821-R\*02-013, October 2002. Definitive tests must be run on the same samples concurrently using both Ceriodaphnia dubia and Fathead Minnows (Pimephales promelas). If the permittee's test results indicate effluent toxicity, the permittee will be required to submit a toxicity reduction evaluation upon notification by the EPD and/or the permit will be reopened to incorporate a WET limit.

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#### PART II

# A. MANAGEMENT REQUIREMENTS

# FACILITY OPERATION

The permittee shall maintain and operate efficiently all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with this permit. Efficient operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. Back-up or auxiliary facilities or similar systems shall be operated only when necessary to achieve permit compliance.

#### 2. CHANGE IN DISCHARGE

Any anticipated facility expansions, or process modifications which will result in new, different, or increased discharges of pollutants requires the submission of a new NPDES permit application. If the changes will not violate the permit effluent limitations, the permittee may notify EPD without submitting an application. The permit may then be modified to specify and limit any pollutants not previously limited.

# NONCOMPLIANCE NOTIFICATION

If, for any reason the permittee does not comply with, or will be unable to comply with any effluent limitations specified in the permittee's NPDES permit, the permittee shall provide EPD with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:

- a. A description of the noncompliance and its cause; and
- b. The period of noncompliance, including the exact date and times; or, if not corrected, the anticipated time the noncompliance is expected to continue; and
- c. The steps taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

# 4. ANTICIPATED NONCOMPLIANCE NOTIFICATION

The permittee shall give written notice to the EPD at least 10 days before:

- a. Any planned changes in the permitted facility; or
- b. Any activity which may result in noncompliance with the permit.

#### OTHER NONCOMPLIANCE

The permittee must report all instances of noncompliance not reported under other specific reporting requirements, at the time monitoring reports are submitted. The reports shall contain the information required under conditions of twenty-four hour reporting.

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# 6. OPERATOR CERTIFICATION REQUIREMENTS

The person responsible for the daily operation of the facility must be a Class I Certified Operator in compliance with the Georgia State Board of Examiners for Certification of Water and Wastewater Plant Operators and Laboratory Analysts Act, as amended, and as specified by Subparagraph 391-3-6-.12 of the Rules and Regulations for Water Quality Control. All other operators must have the minimum certification required by this Act.

#### 7. LABORATORY ANALYST CERTIFICATION REQUIREMENTS

Laboratory Analysts must be certified in compliance with the Georgia State Board of Examiners for Certification of Water and Wastewater Treatment Plant Operators and Laboratory Analysts Act, as amended.

#### 8. BYPASSING

Any diversion of wastewater from or bypassing of wastewater around the permitted treatment works is prohibited, except if:

- a. Bypassing is unavoidable to prevent loss of life, personal injury, or severe property damage;
- b. There are no feasible alternatives to bypassing; and
- c. The permittee notifies the EPD at least 10 days before the date of the bypass.

Feasible alternatives to bypassing include use of auxiliary treatment facilities and retention of untreated waste. The permittee must take all possible measures to prevent bypassing during routine preventative maintenance by installing adequate back-up equipment.

The permittee shall operate the facility and the sewer system to minimize discharge of pollutants from combined sewer overflows or bypasses and may be required by the EPD to submit a plan and schedule to reduce bypasses, overflows, and infiltration.

Any unplanned bypass must be reported following the requirements for noncompliance notification specified in II.A.3. The permittee may be liable for any water quality violations that occur as a result of bypassing the facility.

#### POWER FAILURES

If the primary source of power to this water pollution control facility is reduced or lost, the permittee shall use an alternative source of power if available, to reduce or control all discharges to maintain permit compliance.

#### ADVERSE IMPACT

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge disposal which might adversely affect human health or the environment.

# 11. NOTICE CONCERNING ENDANGERING WATERS OF THE STATE

Whenever, because of an accident or otherwise, any toxic or taste and color producing substance, or any other substance which would endanger downstream users of the waters of the State or would damage property, is discharged into such waters, or is so placed that it might flow, be washed, or fall

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into them, it shall be the duty of the person in charge of such substances at the time to forthwith notify EPD in person or by telephone of the location and nature of the danger, and it shall be such person's further duty to immediately take all reasonable and necessary steps to prevent injury to property and downstream users of said water.

Spills and Major Spills:

A "spill" is any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to the waters of the State.

A "major spill" is any discharge of raw sewage that exceeds 10,000 gallons or results in water quality violations in the waters of the State or the discharge of pollutants into waters of the State by a POTW that exceeds the weekly average permitted effluent limit for BOD<sub>5</sub> or TSS by 50 percent or greater for any one day.

"Consistently exceeding effluent limitation" means a POTW exceeding the 30 day average limit for biochemical oxygen demand or total suspended solids for at least five days out of each seven day period during a total period of 180 consecutive days.

The following specific requirements shall apply to POTW's. If a spill or major spill occurs, the owner of a POTW shall immediately:

- a. Notify EPD, in person or by telephone, when a spill or major spill occurs in the system.
- b. Report the incident to the local health department(s) for the area affected by the incident. The report at a minimum shall include the following:
  - 1. Date of the spill or major spill;
  - 2. Location and cause of the spill or major spill;
  - 3. Estimated volume discharged and name of receiving waters; and
  - Corrective action taken to mitigate or reduce the adverse effects of the spill or major spill.
- c. Post a notice as close as possible to where the spill or major spill occurred and where the spill entered State waters and also post additional notices along portions of the waterway affected by the incident (i.e. bridge crossings, boat ramps, recreational areas, and other points of public access to the affected waterway). The notice at a minimum shall include the same information required in 11(b)(1-4) above. These notices shall remain in place for a minimum of seven days after the spill or major spill has ceased.
- d. Within 24 hours of becoming aware of a spill or major spill, the owner of a POTW shall report the incident to the local media (television, radio, and print media). The report shall include the same information required in 11(b)(1-4) above.
- e. Within five (5) days (of the date of the spill or major spill), the owner of a POTW shall submit to EPD a written report which includes the same information required in 11(b)(1-4) above.
- f. Within 7 days (after the date of a major spill), the owner of a POTW responsible for the major spill, shall publish a notice in the largest legal organ of the County where the incident occurred. The notice shall include the same information required in 11(b)(1-4) above.
- g. The owner of a POTW shall immediately establish a monitoring program of the receiving waters affected by a major spill or by consistently exceeding an effluent limit, with such

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monitoring being at the expense of the POTW for at least one year. The monitoring program shall include an upstream sampling point as well as sufficient downstream locations to accurately characterize the impact of the major spill or the consistent exceedence of effluent limitations described in the definition of "Consistently exceeding effluent limitation" above. As a minimum, the following parameters shall be monitored in the receiving stream:

- 1. Dissolved Oxygen;
- 2. Fecal Coliform Bacteria;
- pH;
- 4. Temperature; and
- 5. Other parameters required by the EPD.

The monitoring and reporting frequency as well as the need to monitor additional parameters, will be determined by EPD. The results of the monitoring will be provided by the POTW owner to EPD and all downstream public agencies using the affected waters as a source of a public water supply.

h. Within 24 hours of becoming aware of a major spill, the owner of a POTW shall provide notice of a major spill to every county, municipality, or other public agency whose public water supply is within a distance of 20 miles downstream and to any others which could be potentially affected by the major spill.

# 12. UPSET PROVISION

Provision under 40CFR 122.41(n)(1)-(4), regarding "Upset" shall be applicable to any civil, criminal, or administrative proceeding brought to enforce this permit.

#### B. RESPONSIBILITIES

#### COMPLIANCE

The permittee must comply with this permit. Any permit noncompliance is a violation of the Federal Act, State Act, and the State Rules, and is grounds for:

- a. Enforcement action;
- b. Permit termination, revocation and reissuance, or modification; or
- c. Denial of a permit renewal application.

It shall not be a defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. The permittee must comply with 40 CFR 122.41(a)

# 2. RIGHT OF ENTRY

The permittee shall allow the Director of the EPD, the Regional Administrator of EPA, and their authorized representatives, agents, or employees after they present credentials to:

- a. Enter the permittee's premises where a regulated activity or facility is located, or where any records required by this permit are kept;
- Review and copy any records required by this permit;

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- c. Inspect any facilities, equipment, practices, or operations regulated or required by this permit; and
- d. Sample any substance or parameter at any location.

# 3. SUBMITTAL OF INFORMATION

The permittee shall furnish any information required by the EPD to determine whether cause exists to modify, revoke and reissue, or terminate this permit or to determine compliance with this permit. The permittee shall also furnish the EPD with requested copies of records required by this permit. If the permittee determines that any relevant facts were not included in a permit application or that incorrect information was submitted in a permit application or in any report to the EPD, the permittee shall promptly submit the additional or corrected information.

#### 4. TRANSFER OF OWNERSHIP OR CONTROL

A permit may be transferred to another person by a permittee if:

- a. The permittee notifies the Director in writing at least 30 days in advance of the proposed transfer:
- b. An agreement is written containing a specific date for transfer of permit responsibility including acknowledgment that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on. This agreement must be submitted to the Director at least 30 days in advance of the proposed transfer; and
- c. The Director does not notify the current permittee and the new permittee within 30 days of EPD intent to modify, revoke and reissue, or terminate the permit. The Director may require that a new application be filed instead of agreeing to the transfer of the permit.

# 5. AVAILABILITY OF REPORTS

Except for data determined to be confidential by the Director of EPD under O.C.G.A. 12-5-26 or by the Regional Administrator of EPA under the Code of Federal Regulations, Title 40, Part 2, all reports prepared to comply with this permit shall be available for public inspection at an EPD office. Effluent data, permit applications, permittees' names and addresses, and permits shall not be considered confidential.

#### 6. PERMIT MODIFICATION

This permit may be modified, terminated, or revoked and reissued in whole or in part during its term for causes including, but not limited to:

- a. Permit violations;
- Obtaining this permit by misrepresentation or by failure to disclose all relevant facts;
- c. Changing any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge:
- d. Changes in effluent characteristics; and
- e. Violations of water quality standards

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The filing of a request by the permittee for permit modification, termination, revocation and reissuance, or notification of planned changes or anticipated noncompliance does not negate any permit condition.

# 7. CIVIL AND CRIMINAL LIABILITY

The permittee is liable for civil or criminal penalties for noncompliance with this permit and must comply with applicable State and Federal laws including promulgated water quality standards. The permit cannot be interpreted to relieve the permittee of this liability even if it has not been modified to incorporate new requirements.

#### 8. PROPERTY RIGHTS

The issuance of this permit does not convey any property rights of either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, or any infringement of Federal, State or local laws or regulations.

# 9. EXPIRATION OF PERMIT

The permittee shall submit an application for permit reissuance at least 180 days before the expiration date of this permit. The permittee shall not discharge after the permit expiration date without written authorization from the EPD. To receive this authorization, the permittee shall submit the information, forms, and fees required by the EPD no later than 180 days before the expiration date.

#### 10. CONTESTED HEARINGS

Any person aggrieved or adversely affected by any action of the Director of the EPD shall petition the Director for a hearing within 30 days of notice of the action.

# 11. SEVERABILITY

The provisions of this permit are severable. If any permit provision or the application of any permit provision to any circumstance is held invalid, the provision does not affect other circumstances or the remainder of this permit.

#### 12. PREVIOUS PERMITS

All previous State water quality permits issued to this facility for construction or operation are revoked by the issuance of this permit. The permit governs discharges from this facility under the National Pollutant Discharge Elimination System (NPDES).

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#### **PART III**

- A. APPROVED INDUSTRIAL PRETREATMENT PROGRAM FOR PUBLICLY OWNED TREATMENT WORKS (POTWs)
  - 1. The permittee's approved pretreatment program shall be enforceable through this permit.
  - 2. The permittee shall administer the approved pretreatment program by:
    - a. Maintaining records identifying the character and volume of pollutants contributed by industrial users to the POTW.
    - b. Enforcing and obtaining appropriate remedies for noncompliance by any industrial user with any applicable pretreatment standard or requirement defined by Section 307(b) and (c) of the Federal Act, 40 CFR Part 403.5 and 403.6 or any State or local requirement, whichever is more stringent.
    - c. Revising the adopted local limits based on technical analyses to ensure that the local limits continue to prevent:
      - 1. Interference with the operation of the POTW;
      - 2. Pass-through of pollutants in violation of this permit;
      - 3. Municipal sludge contamination; and
      - 4. Toxicity to life in the receiving stream.

Within 180 days of the effective date of this permit issuance or reissuance (excluding permit modifications), the permittee shall review the local limits of the program and submit to EPD a written technical evaluation of the need to revise the local limits.

- d. Ensuring that industrial wastewater discharges from industrial users are regulated through discharge permits or equivalent individual control mechanisms. Compliance schedules will be required of each industrial user for the installation of control technologies to meet applicable pretreatment standards and the requirements of the approved program.
- e. Inspecting, surveying, and monitoring to determine if the industrial user is in compliance with the applicable pretreatment standards.
- f. Equitably maintaining and adjusting revenue levels to ensure adequate and continued pretreatment program implementation.
- g. Preparing a list of industrial users which, during the previous twelve months, have been in significant noncompliance with the pretreatment requirements enumerated in 40 CFR Part 403.8 (f)(2)(vii). This list will be published annually in the newspaper with the largest circulation in the service area during April, with the first publication due April 2010.

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# B. APPROVED PRETREATMENT PROGRAM ANNUAL REPORT

- 1. Within 30 days of the close of the reporting period April through March, with the first report due April 2010 and each April thereafter, the permittee shall submit a report to the EPD that includes:
  - a. An updated list of POTW industrial users;
  - b. The results of POTW sampling and analyses required by the EPD;
  - c. A summary of POTW industrial user inspections;
  - d. A summary of POTW operations including information on upsets, interferences, pass through events, or violations of the permit related to industrial user discharges;
  - e. A summary of all activities to involve and inform the public of pretreatment requirements;
  - f. A summary of the annual pretreatment program budget;
  - g. A descriptive summary of any compliance activities initiated, ongoing, or completed against industrial users which shall include the number of administrative orders, show cause hearings, penalties, civil actions, and fines;
  - h. A list of contributing industries using the treatment works, divided into Standard Industrial Classification Code (SIC) categories, which have been issued permits or similar enforceable individual control mechanisms, and a status of compliance for each industrial user. The list should also identify the industries that are categorical or significant industrial users
  - The name and address of each industrial user that has received a conditionally revised discharge limit;
  - j. A list of all industrial users who were in significant noncompliance with applicable pretreatment standards and requirements;
  - k. A list of all industrial users showing the date that each was notified that a categorical pretreatment standard had been promulgated by EPA for their industrial category and the status of each industrial user in achieving compliance within the 3 year period allowed by the Federal Act; and
  - I. A description of all substantial changes proposed for the program. All substantial changes must first be approved by the EPD before formal adoption by the POTW. Substantial changes shall include but not be limited to:

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- 1. Changes in legal authority;
- 2. Changes in local limits;
- Changes in the control mechanisms;
- 4. Changes in the method for implementing categorical pretreatment standards.
- 5. A decrease in the frequency of self-monitoring or reporting required of industrial users:
- A decrease in the frequency of industrial user inspections or sampling by the POTW;
- 7. Significant reductions in the program resources including personnel commitments, equipment, and funding levels;
- 8. Changes in confidentiality procedures; and
- 9. Changes in the POTW sludge disposal and management practices.
- 2. Reports submitted by an industrial user will be retained by the permittee for at least 3 years and shall be available to the EPD for inspection and copying. This period shall be extended during the course of any unresolved litigation concerning the discharge of pollutants by an industrial user or concerning the operations of the program or when requested by the Director.

#### C. INDUSTRIAL PRETREATMENT STANDARDS

Effluent limitations for the permittee's discharge are listed in Part I. Other pollutants attributable to industrial users may also be present in the discharge. When sufficient information becomes available, this permit may be revised to specify effluent limitations for these pollutants based on best practicable technology or water quality standards. Once the specific nature of industrial contributions has been identified, data collection and reporting may be required for parameters not specified in Part I.

# D. REQUIREMENTS FOR EFFLUENT LIMITATIONS ON POLLUTANTS ATTRIBUTABLE TO INDUSTRIAL USERS

- 1. The permittee shall require all industrial dischargers to the POTW to meet State pretreatment regulations promulgated in response to Section 307(b) of the Federal Act. Other information about new industrial discharges may be required and will be requested from the permittee after the EPD has received notice of the discharge.
- 2. The permittee may be required to supplement the requirements of the State and Federal pretreatment regulations to ensure compliance with all applicable effluent limitations listed in Part I. Supplemental actions by the permittee concerning some or all of the industries discharging to the POTW may be necessary.

# E. RETAINER

The EPD may require the permittee to amend an approved pretreatment program to incorporate revisions in State Pretreatment Regulations or other EPD requirements. Any required revision must be incorporated into the program within one year of notification by the EPD. Implementation of any revision or amendments to the program shall be described in the subsequent annual report to the EPD.

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#### **PART IV**

#### A. APPROVED SLUDGE MANAGEMENT PLAN

- 1. The permittee's approved Sludge Management Plan shall be implemented in accordance with Chapter 391-3-6-.17 of the State Rules and EPD's, "Guidelines for Land Application of Sewage Sludge (Biosolids) at Agronomic Rates", unless a more stringent requirement is stated in this Permit, and shall be enforceable through this Permit.
- 2. The permittee will submit an annual report pertaining to the most recent calendar year, as required under Chapter 391-3-6-.17(14) of the State Rules. The annual report shall be submitted to EPD no later than January 31 of the following year.
- 3. The permittee will maintain records of the amount of sludge land applied to each site. The amount of sludge land applied during each calendar year will be reported in the annual report in units of dry tons per year.
- 4. The permittee will monitor in accordance with the following requirements:
  - a. The pH of the sludge and soil mixture from each field within each land application site will be measured once per year. The sample will be a separate, composite sample of each soil type present and will be representative of field conditions.
  - b. The sewage sludge shall be monitored for the following parameters at the frequencies specified in Part IV.A.5:

Parameter	Units*
Total nitrogen	Percent
Ammonia-nitrogen	Percent
Nitrate-nitrogen	Percent
Volatile solids	Percent
Total solids	Percent
рН	Standard units
Arsenic	mg/kg
Cadmium	mg/kg
Copper -	mg/kg
Lead	mg/kg
Mercury	mg/kg
Molybdenum	mg/kg
Nickel	mg/kg
Selenium	mg/kg
Zinc	mg/kg

<sup>\*</sup>Units must be reported on a dry weight basis with the exception of pH.

- c. The pathogen density requirements listed in Chapter 391-3-6-.17(7) of the State Rules shall be monitored at the frequency listed in Part IV.A.5.
- d. The vector attraction reduction requirements listed in Chapter 391-3-6-.17(8)(a) through (8)(h) of the State Rules shall be monitored at the frequency listed in Part IV.A.5.

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5. Monitoring Frequency:

Amount of Sewage Sludge* (dry tons/year)	Frequency
0-300	Once/year
300-1,600	Once/quarter
1,600-16,000	Once/two months
>16,000	Once/month

\*The amount of sewage sludge refers to either the amount of bulk sewage sludge (dry weight) applied to the land or the amount of sewage sludge (dry weight) received by a preparer that sells or otherwise distributes sewage sludge in a bag or other container for application to the land.

- 6. In accordance with Chapter 391-3-6-.17(12) of the State Rules, sewage sludge samples shall be analyzed using EPA approved methods contained in 40 CFR Part 503.8.
- 7. A proposed addition (or removal) of a new land application site(s) will be subject to EPD's review and approval process as outlined in the Guidelines for Land Application of Sewage Sludge (Biosolids). Upon written approval of the Director, addition or removal of a land application site(s) will be considered as amending the approved Sludge Management Plan and as an addendum to the permit.

# Georgia Department of Natural Resources

Environmental Protection Division, Watershed Protection Branch 4220 International Parkway, Suite 101, Atlanta, Georgia 30354 Permitting, Compliance and Enforcement Program 404/362-2680

FAX: 404/362-2691

March 16, 2010

Mr. Chris Thomas
Chief Pollution Control & Implementation Branch
U.S. EPA, Region IV
The Sam Nunn Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

RE:

City of Valdosta – Withlacoochee Water Pollution Control Plant NPDES draft permit No. GA0033235

Dear Mr. Thomas:

EPD has reviewed your comment letter dated January 4, 2010 for the Withlacoochee draft permit. In addition to the recent letter regarding the current draft permit, EPA requested that we address comments from a letter dated July 11, 1997 for the same permit. These comments were addressed in a July 31, 1997 letter from EPD to EPA. We are unsure why we were required to address them again. However, in an effort to move forward with the issuance of this permit, as this is a permit on Georgia's priority permit list, we have addressed these comments once again.

Please review the comments on the attachment pertaining to the Withlacoochee draft permit and let us know if you have any further concerns regarding our proposed actions to address these concerns.

Sincerely,

Jane Hendricks, Manager

Permitting, Compliance, and Enforcement Program

JH/jrb

# **Fact Sheet Addendum**

# Valdosta - Withlacoochee WPCP NDPES Permit No. GA0033235

The original fact sheet incorrectly cited the wrong EPA method used for analyzing Mercury. This was a typographical error; the fact sheet should have read "EPA Methods 1631 E and 1631B."

EPD is including a requirement for the permittee to conduct two additional Chronic Whole Effluent Toxicity tests and one scan of the 129 priority pollutants within the first year of issuance of this permit.

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ongoing monitoring to verify that the actions taken to correct the water quality problems are effective.

- c. The permittee shall develop and put in place best management practices (BMPs) to prevent future water quality standards violations.
- d. The permittee shall provide ongoing monitoring to verify that the BMPs are working or to provide the information necessary to modify the BMPs to achieve water quality standards.

# Annual Report

Once approved, each June 30<sup>th</sup> the permittee is to submit the following to EPD:

- a. An annual certification statement documenting that the plan is being implemented as approved. The certification statement shall read as follows: "I certify, under penalty of law, that the watershed protection plan is being implemented. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
- b All watershed plan data collected during the previous year in an electronic format. This data shall be archived using a digital format such as a spreadsheet developed in coordination with EPD. All archived records, data, and information pertaining to the watershed protection plan shall be maintained permanently.
- c. A progress report that provides a summary of the BMPs that have been implemented and documented water quality improvements. The progress report shall also include any necessary changes to the Watershed Protection Plan.

#### LONG TERM BIOCHEMICAL OXYGEN DEMAND

The permittee shall perform a 120 day long term BOD test, once during the permit period. The test should be performed on an effluent sample collected during the critical period from May 1 through September 30. The results of this test should be provided to Georgia EPD prior to renewal of the permit.

# 10. PRIORITY POLLUTANTS

The permittee must conduct one scan of the 129 priority pollutants during the first year of issuance of this permit. The priority pollutant scans must be measured at least to EPD detection limits. If substances are measured at levels of concern, then the permittee may be required to perform additional priority pollutant analyses or the permit may be modified to include effluent limitations for priority pollutants.

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11. CHRONIC WHOLE EFFLUENT TOXICITY

The permittee must conduct two Whole Effluent Toxicity (WET) tests within the first year of issuance of this permit, with the first test being conducted within 90 days of this authorization. The testing must incorporate the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled "Short-Term Methods for Estimating the Chronic Toxicity of Effluent and Receiving Water to Freshwater Organisms", 4<sup>th</sup> Edition, WPA-821-R\*02-013, October 2002. Definitive tests must be run on the same samples concurrently using both Ceriodaphnia dubia and Fathead Minnows (Pimephales promelas). If the permittee's test results indicate effluent toxicity, the permittee will be required to submit a toxicity reduction evaluation upon notification by the EPD and/or the permit will be reopened to incorporate a WET limit.

1631B 09.27.02 A021160MER

Page



LAB ORDER No.:

C090668

2 of

INURGANIC ANALYTICAL RESULTS

ANALYTE	RESULT	R.L	UNITS	<u>D.F.</u>	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C090668-1 SAMPLE ID: MC 1 MUD CREEK SAMPLED: 18 SEP 02 09:0		•		,		•		
Mercury, Trace Level	0.0018	0.0005	ug/L	. 1	1631B	09.27.02	A021160MER	1
LAB NUMBER: C090668-2 SAMPLE ID: MC 2 MUD CREEK SAMPLED: 18 SEP 02 14:3								
Mercury. Trace Level	0.0020	0.0005	ug/L	1	1631B	09.27.02	A021160MER	1
LAB NUMBER: C090668-3 SAMPLE ID: MC 3 MUD CREEK SAMPLED: 18 SEP 02 19:4			-					
Mercury. Trace Level	0.0022	0.0005	ug/L	1	16318	09.27.02	A021160MER	į
LAB NUMBER: C090668-4 SAMPLE ID: MC 4 MUD CREEK SAMPLED: 19 SEP 02 03:0		-					·	, .
Mercury, Trace Level	0.0025	0.0005	ug/L	1 .	1631B	09.27.02	A021160MER	rij.
LAB NUMBER: C090668-5 SAMPLE ID: W1 WITHLACOOCHE SAMPLED: 18 SEP 02 10:0				•				
Mercury, Trace Level	0.0011	0.0005	ug/L	1	1631B	09.27.02	A021160MER	1

0.0012

0.0005 ug/L

LAB NUMBER: C090668-6

Mercury. Trace Level

SAMPLED:

SAMPLE ID: W2 WITHLACOOCHEE WPCP

18 SEP 02 15:57

<sup>1)</sup> Sample Preparation on 09-26-02 using [631B



C090668

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ANALYTE	RESULT	R.L.	UNITS	D.F	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C090668-7 SAMPLE ID: W3 WITHLACOOCHEE SAMPLED: 18 SEP 02 20:35			·					
Mercury Trace Level	0.0011	0.0005	ug/L	`1	1631B	09.27.02	A021160MER	1
LAB NUMBER: C090668-8 SAMPLE ID: W4 WITHLACOOCHEE SAMPLED: 19 SEP 02 03:40		-						
Mercury, Trace Level	0.0012	0.0005	ug/L	1	1631B	09.2702	A021160MER	1
LAB NUMBER: C090668-9 SAMPLE ID: SOURCE, GUEST RD SAMPLED: 18 SEP 02 15:05		Τ΄ ΄	· ·	,			ç	
Mercury. Trace Level	ND	0.0005	ug/L	1	1631B	09.27.02	A021160MER	Į
LAB NUMBER: C090668-10 SAMPLE ID: DISTILLED. WITHL, SAMPLED: 18 SEP 02 21:00		WATER			,			
Mercury. Trace Level	ND	0.0005	ug/L	1	1631B	09.27.02	A021160MER	L

<sup>1)</sup> Sample Preparation on 09-26-02 using 1631B

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LAB ORDER No.:

C100635

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INORGANIC ANALYTICAL RESULTS		1
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ANALYTE		RESULT	R.L.	MDL	UNITS	D.F	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C100635-1 SAMPLE ID: MC-1 SAMPLED: 16 OCT 02	•									
Mercury. Trace Level		0.0015	0.0 <b>0</b> 05	0.00024	ug/L	1	16318	10.25.02	A021277MER	1.2
LAB NUMBER: C100635-2 SAMPLE ID: MC-2 SAMPLED: 16 OCT 02								,		
Mercury, Trace Level		0.0013.	0.0005	0.00024	ug/L	. 1	16318	10.25.02	A021277MER	1.2
LAB NUMBER: C100635-3 SAMPLE ID: MC-3 SAMPLED: 16 OCT 02	19:38								,	
Mercury, Trace Level		0.0014	0.0005	0.00024	ug/L	. 1	16318	10.25.02	A021277MER	. 1.2
LAB NUMBER: C100635-4 SAMPLE ID: MC-4 SAMPLED: 17 OCT 02	02:30					-				
Mercury. Tráce Level	Ave	0.0012	0.0005	0.00024	ug/L	1	16318	10.25.02	A021277MER	1.2
LAB NUMBER: C100635-5 SAMPLE ID: W-1 SAMPLED: 16 OCT 02	10:20					· .				
Mercury, Trace Level		0.0012	0.0005	0.00024	ug/L ,	1	16318	10.25.02	A021277MER	1.2
LAB NUMBER: C100635-6 SAMPLE ID: W-2 SAMPLED: 16 OCT 02	16:05	·		ver all or an analysis or a						
Mercury, Trace Level	•	0.0008	0.0005	0.00024	ug/L	1	16318	10.25.02	, A021277MER	1.2

<sup>1)</sup> Sample Preparation on 10-24-02 using 1631B

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).



C100635

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ANALYTE	RESULT	Ŕ.L.	MDL	UNITS	D.F	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C100635-7 SAMPLE ID: W-3 SAMPLED: 16 OCT 02 21:40									
Mercury. Trace Level	0.0012	0.0005	0.00024	ug/L	1	· 1631B	10.25.02	A021277MER	1.2
LAB NUMBER: C100635-8 SAMPLE ID: W-4 SAMPLED: 17 OCT 02 04:00		•							
Mercury, Trace Level	0.0010 	0.0005	0.00024	ug/L	1	16318	10.25.02	A021277MER	1.2
LAB NUMBER: C100635-9 SAMPLE ID: S-1 SAMPLED: 16 OCT 02 09:33				•				2	
Mercury, Trace Level	ND	0.0005	0.00024	ug/L	1	16318	10.25.02	A021277MER	1.2.3
LAB NUMBER: C100635-10 SAMPLE ID: S-2 SAMPLED: 16 OCT 02 15:05		-			,			-	
Mercury, Trace Level	ON	0.0005	0.00024	ug/L	1	18318	10.25.02	A021277MER	1,2,3
LAB NUMBER: C100635-11				-					
Mercury. Trace Level	ND	0.0005	0.00024	ug/L	1	16318	10.25.02	A021277MER	1.2.3
LAB NUMBER: C100635-12 SAMPLE ID: S-4 SAMPLED: 17 OCT 02 03:05					·.				
Mercury, Trace Level	0.0014	0.0005	0.00024	ug/L	1	16318	10.25.02	A021277MER	1,2

al) Sample Preparation on 10-24-02 using 16318

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL'is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).

<sup>3)</sup> Analyte was not detected at or above the Method Detection Limit (MDL).



C110745

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INORGANIC ANALYTICAL RESULTS			
	•	•	

ANALYTE	RESULT	<u>R.L.</u>	MDL	UNITS	D.F	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C110745-1 SAMPLE ID: MC-1 MUD CREEK WPCP & SAMPLED: 20 NOV 02 08:25				<i>:</i> .			9		
Mercury, Trace Level	0.0011	0.0005	0.00024	ug/L	1	1631B	12.05.02	A021450MER	1,.2
LAB NUMBER: C110745-2 SAMPLE ID: MC-2 MUD CREEK WPCP SAMPLED: 20 NOV 02 14:20	`		,			1			
Mercury. Trace Level	0.0010	0.0005	0.00024	ug/L	1	1631B	12.05.02	A021450MER	1.2
LAB NUMBER: C110745-3 SAMPLE ID: MC-3 MUD CREEK WPCP SAMPLED: 20 NOV 02 19:03									
Mercury, Trace.Level	0.0010	0.0005	0.00024	ug/L	. 1	16318	12.05.02	A021450MER	1.2
LAB NUMBER: C110745-4 SAMPLE ID: MC-4 MUD CREEK WPCP SAMPLED: 21 NOV 02 01:10	<u></u>		· .						,
Mercury. Trace Level	0.0011	0.0005	0.00024	ug/L	1	16318	12.05.02	A02145UMER.	1.2
LAB NUMBER: C110745-5 SAMPLE ID: W-1 WITHLACOOCHEE WPCP SAMPLED: 20 NOV 02 10:08									
Mercury, Trace Level	0.0011	0.0005	0.00024	ug/L	1	16318	12.05.02	A021450MER	1.2
LAB NUMBER: C110745-6 SAMPLE ID: W-2 WITHLACOOCHEE WPCP SAMPLED: 20 NOV 02 15:48				•			• •		
Mercury. Trace Level	0.0010	0.0005	0.00024	ug/L	1	1631B	12.05.02	A021450MER	1,2

<sup>1)</sup> Sample Preparation on 12-04-02 using 16318

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).



C110745

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ANALYTE	RESULT	<u>R.L.</u>	MDL	UNITS	<u>D.F.</u> _	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C110745-7 SAMPLE ID: W-3 WITHLACOOCHEE WPCP SAMPLED: 20 NOV 02 20:43						,			
Mercury. Trace Level	<b>0</b> .0009	0.0005	0.00024	ug/L	. 1	1631B	12.05.02	A021450MER	1.2
LAB NUMBER: C110745-8 SAMPLE ID: W-4 WITHLACOOCHEE WPCP SAMPLED: 21 NOV 02 02:40							,		
Mercury. Trace Level	0.0010	0.0005	0.00024	ug/L	1	. 1631B	12.05.02	A021450MER	1.2
LAB NUMBER: C110745-9 SAMPLE ID: S-1 GUEST ROAD WATER TR SAMPLED: 20 NOV 02 09:03	REATMENT PLA	NT							
Mercury. Trace Level	ND	0.0005	0.00024	ug/L	. 1	1631B	12.05.02	A02145CMER	1.2.3
LAB NUMBER: C110745-10 SAMPLE ID: S-2 GUEST ROAD WATER TR SAMPLED: 20 NOV 02 14:53	EATMENT PLA	NT							
Mercury. Trace Level	ND '	0.0005	0.00024	ug/L	1	16318	12.05.02	A021450MER	1.2.3
LAB NUMBER: C110745-11 SAMPLE ID: S-3 GUEST ROAD WATER TR SAMPLED: 20 NOV 02 19:43	EATMENT PLAI	NT							
Mercury, Trace Level	ND	0.0005	0.00024	ug/L	1	16318	12.05.02	A021450MER	1.2.3
LAB NUMBER: C110745-12 SAMPLE ID: S-4 GUEST ROAD WATER TR SAMPLED: 21 NOV 02 01:56	EATMENT PLAI	VT				· .		;	
Mercury, Trace Level	ND	0.0005	0.00024	ug/L	.1	. 16318.	12.05.02	A021450MER	1.2.3

<sup>1)</sup> Sample Preparation on 12-04-02 using 16318

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the Towest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).

<sup>3)</sup> Analyte was not detected at or above the Method Detection Limit (MDL).



C120520

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ANALYTE	RESULT	R.L	MDL	UNITS	<u>D.F.</u>	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: C120520-1 SAMPLE ID: MC-1 MUD CREEK SAMPLED: 11 DEC 02 08:43			·						
Mercury. Trace Level	0.0009	0.0005	0.00024	ug/L	1	1631B	12.30.02	A021538MER	1.2
LAB NUMBER: C120520-2 SAMPLE ID: MC-2 MUD CREEK SAMPLED: 11 DEC 02 13:43	·								
Mercury. Trace Level -	0.0008	0.0005	0.00024	ug/L	1	1631B	12.30.02	A021538MER	1.2
LAB NUMBER: C120520+3 SAMPLE ID: MC-3 MUD CREEK SAMPLED: 11 DEC 02 19:30			·	,					
Mercury. Trace Level	0.0010	0.0005	0.00024	ug/L	1	. 1631B	12.30.02	A021533MER	1.2
LAB NUMBER: C120520-4 SAMPLE ID: MC-4 MUD CREEK SAMPLED: 12 DEC 02 01:49				ypotonic.					
Mercury. Trace tevel	0.0007	0.0005	0.00024	ug/L	1	16318	12 30.02	A021538MER	11.2
LAB NUMBER: C120520-5 SAMPLE ID: W-1 WITHLACOOCHEE EFFLUE SAMPLED: 11 DEC 02 10:00	ENT								
Mercury. Trace Level	0.0006	0.0005	0.00024	ug/L	. 1	16318	12:30:02	A021538MER	1.2
LAB NUMBER: C120520-6 SAMPLE ID: W-2 WITHLACOOCHEE EFFLUE SAMPLED: 11 DEC 02 15:09	INT								
Mercury, Trace Level	0.0007	0.0005	0.00024	ug/L	1	16318	12.30.02	A021538MER	1.2

<sup>1)</sup> Sample Preparation on 12-29-02 using 1631B

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).



# ENVIRONMENTAL ANALYSES

LAB ORDER No .:

C120520

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ANALYTE	RESULT	R.L	MDL	UNITS	<u>D.F.</u>	METHOD	ANALYZED	QC BATCH	NOTES:
LAB NUMBER: C120520-7 SAMPLE ID: W-3 WITHLACOOCHEE EFFL SAMPLED: 11 DEC 02 21:14	LUENT			•					
Mercury. Trace Level	0.0007	0.0005	<b>0</b> .00024	ug/L	.1	1631B	12.30.02	A021538MER	1.2
LAB NUMBER: C120520-9 SAMPLE ID: S-1 GUEST ROAD WTP SAMPLED: 11 DEC 02 09:15				1			419		
Mercury. Trace Level	ND	0.0005	0.00024	ug/L	1	1631B	12.30.02	A021538MER	1,2,3
LAB NUMBER: C120520-10 SAMPLE ID: S-2 GUEST ROAD WTP SAMPLED: 11 DEC 02 14:19								,	
Mercury. Trace Level	ND	0.0005	0.00024	ug/L	1	16318	12.30.02	A021538MER	1.2.3
LAB NUMBER: C120520-11 SAMPLE ID: S-3 GUEST ROAD WTP SAMPLED: 11 DEC 02 20:29			,						
Mercury. Trace Level	П	0.0005	0.00024	ug/L	1	16318	12.30.02	A021538MER	1,2,3
LAB NUMBER: C120520-12 SAMPLE ID: S-4 GUESTROAD WTP SAMPLED: 12 DEC 02 02:29			· ` `					. ,	
Mercury, Trace Level	ND	0.0005	0.00024	ug/L	. 1	16318	12.30.02	A021538MER	1.2.3
LAB NUMBER: C120520-13 SAMPLE ID: D1STILLED SAMPLED: 11 DEC-02 19:52									,
Mercury, Trace Level	J0.00037	0.0005	0.00024	ug/L	1	1631B	12.30.02	A021538MER	-1,2,4

<sup>1)</sup> Sample Preparation on 12-29-02 using 16318

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State [mplementation Plan (SIP) of the California Toxics Rule (CTR).

<sup>3)</sup> Analyte was not detected at or above the Method Detection Limit (MDL).

<sup>4)</sup> A "J" flagged result indicates an estimated concentration above the Method Detection Limit (MDL) and below the RL/ML (Reporting Limit/Minimum Level). The 'J' flag is equivalent to the DNQ Estimated Concentration flag.

INORGANIC ANALYTICAL RESULTS



LAB ORDER No.:

D010317

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ANALYTE	_	RESULT	<u>R.L.</u>	MDL	UNITS	D.F	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: D010317-1 SAMPLE ID: MC-1 SAMPLED: 08 JAN 03	08:41							·		•
Mercury, Trace Level		0.0010	0.0005	0.00024	ug/L	1	. 1631E	01.17.03	A030060MER	1.2
LAB NUMBER: D010317-2 SAMPLE ID: MC-2 SAMPLED: 08 JAN 03	14:01						·			
Mercury, Trace Level		0.0010	0.0005	0.00024	ug/L	1	1631E	01.17.03	A030060MER	1.2
LAB NUMBER: D010317-3 SAMPLE ID: MC-3 SAMPLED: 98 JAN 03	19:35	_				<del>-</del>	· ·			
Mercury. Trace Level		0.0008	0.0005	0.00024	ug/L	1	1631E	01.17.03	A030060MER	1.2
LAB NUMBER: D010317-4 SAMPLE ID: MC-4 SAMPLED: 09 JAN 03	02:45									<del></del>
Mencury, Trace Level		0.0009	0.0005	0.00024	ug/L	1	16315	01.17.03	A030060MER	1.2
LAB NUMBER: D010317-5 SAMPLE IO: W-1 . SAMPLED: 08 JAN 03	10:00				r		-			
Mercury, Trace Level		0.0029	0.0005	0.00024	ug/L	1	16316	01.17.03	A030060MER	. 1.2
LAB NUMBER: D010317-6 SAMPLE ID: W-2 SAMPLED: 08 JAN 03	15:41			,			•		-	
Mercury. Trace Level		0.0011	0.0005	0.00024	ug/L	. 1	1631E	-01.17.03	A030060MER	1.2

<sup>1)</sup> Sample Preparation on 01-16:03 using 1631E

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).



LAB ORDER No.:

0010317

INORGANIC ANALYTICAL RESULTS

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ANALYTE	RESULT	R.L	MDL	UNITS	. <u>D.F.</u>	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: D010317-7 SAMPLE ID: W-3 SAMPLED: 08 JAN 03 20:55						· ·		, .	
Mercury. Trace Level	0.0012	0.0005	0.00024	ug/L	1	1631E	01.17.03	A030060MER	1.2
LAB NUMBER: D010317-8 SAMPLE ID: W-4 SAMPLED: 09 JAN 03 04:10				,					
Mercury. Trace Level	0.0011	0.0005	0.00024	ug/L	1	1631E	01.17.03	A030060MER	1,2
LAB NUMBER: D010317-9 SAMPLE ID: S-1 SAMPLED: 08 JAN 03 09:15		-							
Mercury. Trace Level	ND	0.0005	0.00024	ug/L	1	1631E	01.17.03	A030060MER	1.2.3
LAB NUMBER: D010317-10 SAMPLE ID: S-2 SAMPLED: 08 JAM'03 14:42			,	•		,		,	
Mercury, Trace Level	J0.00031	0.0005	0.00024	ug/Ļ	. 1	1631E	01.17.03 	A030060MER	1.8.4
LAB NUMBER: D010317-11 SAMPLE ID: S-3 SAMPLED: 08 JAN 03 20:10				24.					
Mercury. Trace Level	ND .	0.0005	0.00024	ug/L	. 1	1631E	01.17.03	A030060MER	1.2.3
LAB NUMBER: D010317-12 SAMPLE ID: S-4 SAMPLED: 09 JAN 03 03:15						-			
Mercury, Trace Level	ND	0,0005	0.00024	ug/L	1	1631E	01.17.03	A030060MER	1.2.3

<sup>1)</sup> Sample Preparation on 01-16-03 using 1631E

<sup>2)</sup> RL (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).

<sup>3)</sup> Analyte was not detected at or above the Method Detection Limit (MDL).

<sup>4)</sup> A "J" flagged result indicates an estimated concentration above the Method Detection Limit (MDL) and below the RL/ML (Reporting Limit/Minimum Level). The 'J' flag is equivalent to the DNQ Estimated Concentration flag.

INORGANIC ANALYTICAL RESULTS



LAB ORDER No.:

D020219

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ANALYTE	RESULT	<u>R.L.</u>	MDL	UNITS	<u>D.F.</u>	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: D020219-1 SAMPLE ID: MC-1 SAMPLED: 05 FEB 03 09:29									
Mercury, Trace Level	0:0010	0.0005	0.00024	ug/L	1	1631E	02.19.03	A030174MER	1.2
LAB NUMBER: D020219-2 SAMPLE ID: MC-2 SAMPLED: 05 FEB 03 13:45									
Mercury, Trace Level	0.0010	. 0.0005	0.00024	ug/L	1	1631E	02.19.03	A030174MER	1.2
LAB NUMBER: D020219-3 SAMPLE ID: MC-3 SAMPLED: 05 FEB 03 19:30				,		,		1	
Mercury, Trace Level	0.0009	0.0005	0.00024	ug/L	1	1631E	02.19.03	A030174MER	1.2
LAB NUMBER: D020219-4 SAMPLE ID: MC-4 SAMPLED: 06 FEB 03 02:16									
Mercury. Trace Level	0.0011	0 0005	0.00024	ug/L	1	16315	02.19103	A030174MER	1.2
LAB NUMBER: D020219-5 SAMPLE ID: W-1 SAMPLED: 05 FEB 03 10:50									
Mercury. Trace Level	0.0014	0.0005	0.00024	ug/L	. 1	1631E	02.19.03	A030174MER	1.2
LAB NUMBER: D020219-6 SAMPLE ID: W-2 SAMPLED: 05 FEB 03 15:10									
Mercury. Trace Level	0.0013	0.0005	0.00024	ug/L	1	1631E	02.19.03	A030174MER	1.2

<sup>1)</sup> Sample Preparation on 02-18-03 using 1631E .
2) 'RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR):



LAB ORDER No.:

0020219

INORGANIC ANALYTICAL RESULTS

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ANALYTE		RESULT	R.L.	MDL	UNITS	D.F	•	METHOD	ANALYZED	QC BATCH	NOTES
LAB NUMBER: D020219-7 SAMPLE ID: W-3 SAMPLED: 05 FEB 03 2	0:53										
Mercury. Trace Level		0.0028	0.0005	0.00024	ug/L		1	1631 <b>E</b>	02.19.03	A0301 <b>7</b> 4MER	1,.2
LAB NUMBER: D020219-8 SAMPLE ID: W-4 SAMPLED: 06 FEB 03 03	3:40						. •				
Mercury. Trace Level		0.0022	0.0005	0.00024	ug/L		1	1631E	02.19.03	A030174MER	1.2
LAB NUMBER: D020219-9 SAMPLE ID: S-1 SAMPLED: 05 FEB 03 10	Ó: 05								÷	•	
Mercury, Trace Level		ND .	0.0005	0.00024	úg/L		1	1631E	02.19:03	A030174MER	1.2.3
LAB NUMBER: D020219-10 SAMPLE ID: S-2 SAMPLED: 05 FEB 03 14	4:17							,			
Mercury. Trace Level		ND ND	0.0005	0.00024	ug/L		1	1631E	02.19.03	A030174MER	1.2.3
LAB NUMBER: D020219-11 SAMPLE ID: S-3 SAMPLED: 05 FEB 03 20	0:09								,	,	
Mercury. Trace Level		DN	0.0005	0.00024	ug/L		1 . ,	1631E	02.19.03	A030174MER	1.2.3
LAB NUMBER: D020219-12 SAMPLE ID: S-4 SAMPLED: 06 FEB 03 02	2:50	•									
Mercury, Trace Level		ND	0.0005	0.00024	ug/L		٠.	1631E	02.19.03	A030174MER	1.2.3

<sup>1)</sup> Sample Preparation on 02-18-03 using 1631E

<sup>2) &#</sup>x27;RL' (Reporting Limit) represents the lowest calibration standard in methods that require multipoint calibrations. RL is equivalent to the ML (Minimum Level) in the State Implementation Plan (SIP) of the California Toxics Rule (CTR).

<sup>3)</sup> Analyte was not detected at or above the Method Detection Limit (MDL).



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 4 2010

Ms Jane Hendricks
Program Manager II
Permitting, Compliance and Enforcement
Water Protection Branch
Georgia Environmental Protection Division
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

SUBJECT: NPDES Overview – Draft Permit comments
NPDES Number GA0033235
City of Valdosta, Withlacoochee WPCP, Lowndes County, Georgia

Dear Ms. Hendricks:

The Environmental Protection Agency (EPA) received a copy of the above-referenced draft National Pollutant Discharge Elimination System (NPDES) permit via electronic mail from the Georgia Environmental Protection Division (GA EPD) on December 4, 2009. We have completed our preliminary review of the draft permit and would like to submit the following comments for your records.

- A. Our examination of the City of Valdosta's NPDES application for the facility revealed that it was submitted several years ago, and may not reflect current operational conditions. Effluent characterization is an essential step in determining the need for an NPDES permit limit. Old effluent data cannot on its own confirm or deny whether substantial changes have occurred in the volume or characteristics of pollutants, or if there has been an introduction of new pollutants to the POTW without the assistance of recent analytical effluent data. (See 40 CFR 122.42(b).) Although, new permit limitations can be issued without such [new] data, if the regulatory agency can satisfy all the requirements of 40 CFR 122.44(d)(1)(ii) through (vi); EPA recommends that the 2006 waste load allocation should be updated to incorporate the current environmental conditions.
- B. EPA recognizes that the application includes a process description summary, however; to adequately review the conditions and confines of the facility the submittal-application package from EPD to EPA should always include a Topographic map (or other map if a topographic map is unavailable) extending one mile beyond property boundaries of the facility and showing the following information: (i) All sewage sludge management facilities, including on-site treatment, storage, and disposal sites; and (ii) Wells, springs,

and other surface water bodies that are within 1/4 mile of the property boundaries and listed in public records or otherwise known to the applicant.

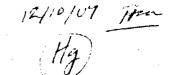
- C. Because Georgia is not a federally delegated state with authority to implement the 40 CFR §503 sludge program, additional information should be provided to permittees to assist them with compliance with not only the program requirements of the State of Georgia, but also the self-implementing federal regulations. For example:
  - a. The permit should include language that references the federal regulations for Sewage Sludge found in 40 CFR §503, in addition to the program requirements of the State of Georgia.
  - b. Pages 20 and 21 of the draft permit express monitoring conditions and frequencies that are less stringent than those requirements found in Subpart B Land Application of Sewage Sludge and are contrary to the federal regulations. Specifically: "(1) The frequency of monitoring for the pollutants listed in Table 1, Table 2, Table 3 and Table 4 of \$503.13; the pathogen density requirements in \$503.32(a) and \$503.32(b)(2); and the vector attraction reduction requirements in \$503.33 (b)(1) through (b)(4) and \$503.33 (b)(7) through (b)(8) shall be the frequency in Table 1 of \$503.16." et.al.
  - c. Starting with Part IV A. Approved Sludge Management Plan, Item 4. a. through d., the monitoring plan significantly exceeds the values as stated in Table 1 of §503.16—Frequency of Monitoring—Land Application as shown here for reference.

Amount of sewage sludge <sup>1</sup> (metric tons per 365 day period)	Frequency			
Greater than zero but less than 290	Once per year.			
Equal to or greater than 290 but less than 1,500	Once per quarter (four times per year).			
Equal to or greater than 1,500 but less than 15,000	Once per 60 days (six times per year).			
Equal to or greater than 15,000	Once per month (12 times per year).			

EPA recommends the current draft permit be revised to comply with these federal regulations.

D. The fact sheet expresses the basis for not including further final effluent limits and permit conditions for Mercury monitoring by referencing the February 28, 2002, TMDL in the Withlacoochee Watershed. The fact sheet expressly indicates that the City conducted a Mercury Characterization/Minimization Plan using EPA Method 1661. According to the TMDL the appropriate method should have been EPA Method 1631. The TMDL specifically references that EPA Method 1631E and 245.7 are the most sensitive methods and should therefore be applied for sampling and analysis of mercury to determine the need for additional monitoring and/or permit limitations. Please supplement the application information or fact sheet to clarify the method used by the facility to characterize mercury. If the proper method was not used, the permit should be revised to require performance of a Mercury Characterization/Minimization Plan using the appropriate method. If this is a typographical error, please state that in an addendum to







#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

CEPOPTES WATER

signed: August 23, 2007
MEMORANDUM

SUBJECT: Analytical Methods for Mercury in National Pollutant Discharge Elimination

System (NPDES) Permits

FROM: James A. Hanlon, Director

Office of Wastewater Management

**TO:** Water Division Directors, Regions 1 – 10

The purpose of this memorandum is to inform you of EPA's March 12, 2007, approval of Method 245.7 for measurement of mercury and modified versions of approved analytical methods for mercury as well as the impact of their approval on the NPDES permitting process. While several different methods are currently approved under 40 CFR Part 136 for the analysis of mercury, some of these methods have much greater sensitivities and lower quantitation levels than others. This memorandum clarifies and explains that, in light of existing regulatory requirements for NPDES permitting, only the most sensitive methods such as Methods 1631E and 245.7 are appropriate in most instances for use in deciding whether to set a permit limitation for mercury and for sampling and analysis of mercury pursuant to the monitoring requirements within a permit.

## **BACKGROUND**

Section 301 of the Clean Water Act (CWA) requires NPDES permits to include effluent limitations that are as stringent as necessary to meet water quality standards. Thus, under the Act and EPA regulations, each permit must include, as necessary, requirements in addition to or more stringent than technology-based effluent limitations established under section 301 of the CWA in order to achieve water quality standards. 40 C.F.R. § 122.44(d)(1). The regulations require limitations to control all pollutants that the NPDES program director determines are or may be discharged at a level that "will cause, have the reasonable potential to cause, or contribute to an excursion above any state water quality standard," including both narrative and

This memorandum is based on existing legal requirements and authorities. It does not impose any new, legally binding requirements on EPA, states, or the regulated community.

numeric criteria. 40 C.F.R. § 122.44(d)(1)(i). If the program director determines that a discharge has the reasonable potential to cause or contribute to such an excursion, the permit must contain water quality-based effluent limitations for the pollutant. 40 C.F.R. § 122.44(d)(1)(iii). Thus, a prospective permittee may need to measure various pollutants in its effluent at two stages: first, at the permit application stage so that the program director can determine whether "reasonable potential" exists and establish appropriate permit limits; and second, where a permit limit has been established, to meet the monitoring requirements within the permit. The following discussion explains which analytical methods permit applicants and permittees should use to make these measurements when mercury is the pollutant at issue.

## **Approved Analytical Methods**

Measurements included on NPDES permit applications and on reports required to be submitted under the permit must generally be made using analytical methods approved by EPA under 40 CFR Part 136. See 40 CFR 136.1, 136.4, 136.5, 122.21(g)(7), and 122.41(j). For mercury, there are three methods commonly used in the NPDES program that EPA has approved under Part 136: Method 245.1, Method 245.2, and Method 1631E. Methods 245.1 and 245.2 were approved by EPA in 1974 and can achieve measurement of mercury down to 200 parts per trillion (ppt). Additionally, EPA approved Method 1631 Revision E in 2002. Method 1631E has a quantitation level of 0.5 ppt, making it 400 times more sensitive than Methods 245.1 and 245.2. In fact, the sensitivity of Methods 245.1 and 245.2 are well above the water quality criteria now adopted in most states (as well as the criteria included by EPA in the Final Water Quality Guidance for the Great Lakes System) for the protection of aquatic life and human health, which generally fall in the range of 1 to 50 ppt. In contrast, Method 1631E, with a quantitation level of 0.5 ppt, does support the measurement of mercury at these low levels.

In addition to Methods 245.1, 245.2, and 1631E listed above, EPA approved Method 245.7 as well as modified versions of other EPA-approved methods on March 12, 2007. See 72 FR 11200. Method 245.7 has a quantitation level of 5.0 ppt, making it 40 times more sensitive than Methods 245.1 and 245.2. Additionally, modified versions of EPA-approved methods may also be used for the measurement of mercury. Methods approved under Part 136, such as 245.1 and 245.2, may be modified to achieve lower quantitation levels than can be achieved by the method as written. Modifications to an EPA-approved method for mercury that meet the method

Many states have adopted mercury water quality criteria of 12 ppt for protection of aquatic life and 50 ppt for the protection of human health, and for discharges to the Great Lakes Basin, the applicable water quality criteria for mercury are 1.3 ppt for the protection of wildlife and 1.8 ppt for the protection of human health. In 2001, EPA issued new recommended water quality criteria guidance for the protection of human health. This new guidance recommends adoption of a methylmercury water quality criterion of 0.3 milligrams of methylmercury per kilogram (mg/kg) in fish tissue. EPA is currently developing implementation guidance to assist states in implementing the criterion, and *Draft Guidance for Implementing the January 2001 Methylmercury Water Quality Criterion* (EPA-823-B-04-001) was released for public comment in August 2006.

Examples of such modification may include changes in the sample preparation digestion procedures such as the use of reagents similar in properties to ones used in the approved method, changes in the equipment operating parameters such as the use of an alternate more sensitive wavelength, adjusting the sample volume to optimize method performance, and changes in the calibration ranges (provided that the modified range covers any relevant regulatory limit).

performance requirements of Part 136.6 are considered to be approved methods and require no further EPA approval. See 72 FR 11239-40 (March 12, 2007). For analytical method modifications that do not fall within the flexibility of Part 136.6, the modified methods may be approved under the alternate test procedure program as defined by Parts 136.4 and 136.5.

## ACTIONS RESULTING FROM THE MARCH 12, 2007, RULEMAKING

To implement the March 12, 2007, rule, the Office of Wastewater Management (OWM) provides the following guidance:

## Monitoring Data Submitted as Part of NPDES Permit Applications

As noted, most states have adopted water quality criteria for the protection of aquatic life and human health that fall in the range of 1 to 50 ppt, and Methods 245.1 and 245.2, as written, do not detect or quantify mercury in this range. A "did not detect" result using Method 245.1 or Method 245.2 would show only that mercury levels are below 200 ppt but would not establish that they are at or below the applicable water quality criterion. Therefore, when a permit writer receives a permit application reporting mercury data analyzed with Method 245.1 or Method 245.2 as "did not detect" results, the permit writer in reality may lack the information needed to make a "reasonable potential" determination. In contrast, Method 1631E is able to detect and quantify mercury concentrations at these low levels.

EPA therefore expects, in general, that all facilities with the potential to discharge mercury will provide with their NPDES permit applications monitoring data for mercury using Method 1631E or another sufficiently sensitive EPA-approved method. For purposes of permit applications, a method for mercury is "sufficiently sensitive" when (1) its method quantitation level is at or below the level of the applicable water quality criterion for mercury or (2) its method quantitation level is above the applicable water quality criterion, but the amount of mercury in a facility's discharge is high enough that the method detects and quantifies the level of mercury in the discharge. Accordingly, EPA strongly recommends that the permitting authority determine that a permit application that lacks effluent data analyzed with a sufficiently sensitive EPAapproved method such as Method 1631E is incomplete unless and until the facility supplements the original application with data analyzed with such a method. See 40 CFR 122.21(e) (a permit application is determined to be complete at the discretion of the permitting authority) and 40 CFR 122.21(g)(13) (the applicant shall provide to the Director, upon request, such other information as the Director may reasonably require to assess the discharge). Such data would allow the permitting authority to characterize the effluent to determine whether the discharge causes, has the reasonable potential to cause, or contributes to an excursion of state water quality standards for mercury and would consequently allow the permitting authority to determine whether a water quality-based effluent limit for mercury is necessary in the permit.

To illustrate the latter, if the water quality criterion for mercury in a particular state is 2.0 ppt, Method 245.7 (with a quantitation level of 5.0 ppt) would be sufficiently sensitive where it reveals that the level of mercury in a facility's discharge is 5.0 ppt or greater. In contrast, Method 245.7 would not be sufficiently sensitive if it resulted in a level of non-detect for that discharge because it could not be known whether mercury existed in the discharge at a level between 2.0 and 5.0 (less than the quantitation level but exceeding the water quality criterion).

## Monitoring Requirements in Permits

Where a permit authority establishes a permit limit for mercury, it also needs to consider specifying an analytical method that the permittee must use to monitor for mercury during the term of the permit. Methods 245.1 and 245.2, as written, are not likely to be sensitive enough to detect or quantify the concentration of mercury in the discharge at a level that matches the limitation for mercury in the permit. EPA therefore expects the permitting authority to require the use of a sufficiently sensitive EPA-approved method for monitoring under the permit in order to ensure that the sampling and measurements required are "representative of the monitored activity" (as required by 40 CFR 122.41(j)(1)). For purposes of monitoring under a permit, a method for mercury is "sufficiently sensitive" when (1) its method quantitation level is at or below the level of the mercury limit established in the permit or (2) its method quantitation level is above the mercury limit in the permit, but the amount of mercury in a facility's discharge is high enough that the method detects and quantifies the level of mercury in the discharge.<sup>5</sup>

### EPA Permit Review and Objection to State Issued Permits

For NPDES-authorized states, EPA regions are expected to review state permits and should strongly consider objecting to permits that are issued based on analytical data collected and analyzed using an EPA-approved method that is not sufficiently sensitive or that do not require use of a sufficiently sensitive EPA-approved method for monitoring when the permit includes a limit for mercury. OWM is expecting to undertake a permit quality review of a small representative number of permits with respect to mercury limitations and other conditions.

If you have questions concerning the content of this memorandum, please contact Linda Boornazian, Director of the Water Permits Division, at 202-564-0221 or have your staff contact Marcus Zobrist of the State and Regional Branch at 202-564-8311 or zobrist.marcus@epa.gov.

NPDES Branch Chiefs Regions 1 – 10

cc:

See footnote 4.

## Ammons, Brad

From:

Mundrick, Doug

Sent:

Tuesday, June 24, 2014 11:50 AM

To:

Ammons, Brad

Subject:

RE: Valdosta, GA breaks ground on force main/new WWTP project

## Good news!

From: Ammons, Brad

Sent: Tuesday, June 24, 2014 11:32 AM

To: Horsey, Maurice

Cc: Diaz, Denisse; Mundrick, Doug

Subject: Valdosta, GA breaks ground on force main/new WWTP project

FYI.

http://valdostatoday.com/2014/06/city-breaks-ground-on-32-million-force-main-project/

### **Brad Ammons**

Environmental Engineer Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F)

http://www.epa.gov/region4/water/wpeb/index.html

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## Ammons, Brad

From:

Delli-Gatti, Dionne

Sent:

Tuesday, May 20, 2014 9:50 AM

To:

Ammons, Brad

Subject:

RE: Sewage Spills - Withlacoochee River

Thanks Brad this is great.

Dionne

Dionne Delli-Gatti, LEED GA Acting Congressional Liaison US EPA Region 4 404-562-9912

http://www.epa.gov/region4/newsevents/index.html

Follow Region 4 on Twitter: www.twitter.com/EPASoutheast

and Facebook: www.facebook.com/eparegion4

From: Ammons, Brad

Sent: Tuesday, May 20, 2014 8:43 AM

To: Delli-Gatti, Dionne

Cc: Horsey, Maurice; Diaz, Denisse; Elliott, Richard; Ammons, Brad

Subject: FW: Sewage Spills - Withlacoochee River

#### Dionne:

As discussed, below is the brief summary of our involvement with the City of Valdosta, GA related to sanitary sewer overflows (SSOs).

On October 23, 2012, the EPA (Region 4) sent an information request letter to the City of Valdosta, Georgia pursuant to Section 308 of the Clean Water Act, 33 U.S.C. §1318 seeking information about the City's Sanitary Sewer Overflows (SSOs) as part of EPA Region 4's implementation of the Municipal Infrastructure National Enforcement Initiative. Upon review of the City's response to the information request letter, the EPA Region 4 met with representatives of the City, as well as representatives of the State of Georgia Environmental Protection Division (GA EPD) on February 28, 2013, which happened to coincide with the City's Withlacoochee Water Pollution Control Plant (WPCP) being inundated with floodwaters due to heavy rains/severe weather. The EPA and the GA EPD worked collaboratively on review of the City's response to the information request letter, as well as several plans the City submitted over the March — April, 2013 timeframe. At the end of April, 2013, the City adopted a five (5) year plan to relocate the Withlacoochee WPCP to prevent future flooding, implement short term improvements to the existing Withlacoochee River WPCP and assess and rehabilitate the City's sanitary sewer system to prevent future SSOs. The City and GA EPD negotiated and finalized a Consent Order in December 2013 that required implementation of the City's 5 year plan and requires all studies and/or implementation of remedial measures to be completed by December 2018.

I'm attaching the EPA's information request letter, the GA EPD's Consent Order and below is a weblink to EPA's Municipal Infrastructure National Enforcement Initiative. I'll leave it up to you if you want to send these items to the Senator's office.

http://www2.epa.gov/enforcement/national-enforcement-initiative-keeping-raw-sewage-and-contaminated-stormwater-out-our

#### **Brad Ammons**

Environmental Engineer Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F)

http://www.epa.gov/region4/water/wpeb/index.html

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From: Diaz, Denisse

**Sent:** Monday, May 19, 2014 9:57 AM **To:** Mundrick, Doug; Delli-Gatti, Dionne

Cc: Elliott, Richard; Horsey, Maurice; Ammons, Brad Subject: RE: Sewage Spills - Withlacoochee River

#### Dionne:

Like Doug mentioned the State has an order with Valdosta, which we reviewed and approved. Brad Ammons of my staff is the contact for this one, but today is his CDO. I am copying Richard Elliot who is acting Section Chief today just in case this can't wait until tomorrow. Thanks.

## Denisse

From: Mundrick, Doug

**Sent:** Monday, May 19, 2014 9:20 AM **To:** Delli-Gatti, Dionne; Diaz, Denisse

Subject: FW: Sewage Spills - Withlacoochee River

Importance: High

Dionne, Denisse is checking into who is available that can speak to this. I do know that we let the state take the lead on it...they have an order with Valdosta. We'll get you someone who can give more specifics.

#### Doug

From: Delli-Gatti, Dionne

Sent: Monday, May 19, 2014 8:15 AM

To: Mundrick, Doug

Subject: FW: Sewage Spills - Withlacoochee River

Importance: High

Doug,

Senator Nelson's office has asked if we are involved in this issue. Do you know if we are and what the status and/or the appropriate contact person would be?

Thanks Dionne

Dionne Delli-Gatti, LEED GA Acting Congressional Liaison US EPA Region 4 404-562-9912

http://www.epa.gov/region4/newsevents/index.html

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and Facebook: www.facebook.com/eparegion4

From: Sher, Lauren (Bill Nelson) [mailto:Lauren Sher@billnelson.senate.gov]

Sent: Friday, May 16, 2014 3:23 PM

To: Delli-Gatti, Dionne Cc: Wise, Allison

Subject: FW: Sewage Spills - Withlacoochee River

Importance: High

Dionne,

Can you help us understand if EPA is getting involved in this issue?

Thank you,

Lauren Sher

Lauren Sher: Legislative Assistant | Senator Bill Nelson | SH-716 | Washington, DC 20510 | 🖀 202-224-1511 (direct) Lauren\_sher@billnelson.senate.gov

From: Cindy Vees [mailto:cindy@madisonfl.org]
Sent: Tuesday, March 25, 2014 10:54 AM

To: rick.scott@myflorida.com

Cc: frontdesk@madisonfl.org; cindy@madisonfl.org; Meyer, Lisa; perciasepe.bob@epa.gov; meiburg.stan@epa.gov; cdoolin@nettally.com; jon.steverson@nwfwmd.state.fl.us; htanzler@sjrwmd.com; koons@ncfrpc.org; halsey.beshears@myfloridahouse.gov; keith.perry@myfloridahouse.gov; elizabeth.porter@myfloridahouse.gov; bryan@em.myflorida.com; jesse.panuccio@deo.myflorida.com; bill.killingsworth@deo.myflorida.com; gswoope@eflorida.com; hershel.vineyard@dep.state.fl.us; nick.wiley@myfwc.com; roland.garcia@myfwc.com; health@doh.state.fl.us; will@visitflorida.org; bill.montford.web@flsenate.gov; Bannister, Lynn (Bill Nelson); rachel.king@mail.house.gov; hamcoc@windstream.net; LAFAYETTE CNTY CHMBR; lafayette911@windstream.net; Dawn

Taylor; staff@suwanneechamber.com; Austin Richmond; tami@suwanneevalleytimes.com; garin.flowers@gmail.com;

emerald@greenepublishing.com; news@madisonfl.org

Subject: Sewage Spills - Withlacoochee River

Importance: High

March 25, 2014

Honorable Rick Scott, Governor The Capitol Tallahassee, FL 32399

Cc: Honorable Senator Bill Montford

Honorable Representative Halsey Beshears

Nick Wiley, Executive Director, Fish & Wildlife Conservation Commission

Bryan Coon, Director, Florida Division of Emergency Management

Mr. Gray Swoope, President & CEO, Department of Economic Opportunity

Dr. John Armstrong, Florida Department of Health

Print and television news sources in north Florida and south Georgia

**Surrounding County Chambers of Commerce** 

In Re: Sewage spills into the Withlacoochee River

Dear Honorable Governor Scott,

Madison County staff has reached out to leadership in Valdosta, GA regarding recent reports of 1,033,500 gallons "and counting" of untreated wastewater from the City of Valdosta sewage system that has spilled into waterways that flow through our community.

I have attached the response we received from Mr. Larry Hanson, City Manager, City of Valdosta along with several other reports that indicate sewage leakage issues for the past five years, since the flooding of 2009.

This ongoing situation has had, and will continue to have devastating economic impact on our local economy and tourism. It is unknown the total economic impact, however, our tourism revenues do not meet the recent reported tourism trends by Visit Florida. The Withlacoochee and Suwannee Rivers are vital to our environment and the ecotourism assets we have here and we believe that this situation will have a long lasting negative economic impact on our community.

We trust that this matter will be held at a high level of priority, and that we can depend on the State of Florida to seek not only a solution to the problem, but economic restitution from the State of Georgia for the counties that are being affected.

My formal letter of request and documentation is attached.

Respectfully,

## Cindy Vees Executive Director

## **Madison County Chamber of Commerce & Tourism**

248 S.W. Range Avenue ~ Madison, FL ~ 32340 P.O. Box 817 ~ Madison, FL ~ 32341

7.0. DOX 017 Widdison, 1E 32541

Toll Free: 877-272-3642 Local: 850-973-2788

Fax: 850-973-8864 Cell: \$850-464-7611

Website: <a href="www.madisonfl.org">www.madisonfl.org</a> Email: <a href="mailto:cindy@madisonfl.org">cindy@madisonfl.org</a>







## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 2 3 2012

## CERTIFIED MAIL 7012 1010 0001 8097 0689 RETURN RECEIPT REQUESTED

City of Valdosta Attn: Mr. Larry H. Hanson City Manager 216 East Central Avenue P.O. Box 1125 Valdosta, Georgia 31603-1125

Re: Information Request – Section 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit Nos. GA0033235 and GA0020222
Withlacoochee River Wastewater Treatment Plant and Mud Creek Wastewater Treatment Plant

Dear Mr. Hanson:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency, Region 4 hereby requests the City of Valdosta (the City) to provide the information set forth in Enclosure A regarding the wastewater treatment plants noted above and their associated sanitary sewer collection systems. The City is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Mr. David Phillips, Enforcement Officer
U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The City's response to this information request should specifically reference the particular section and number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible City of Valdosta official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic) which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place, as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch at the U.S. EPA, Region 4.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

Also enclosed is a document entitled U.S. EPA Small Business Resources-Information Sheet, which may assist you in understanding the compliance assistance resources and tools available. However, any decision to seek compliance assistance at this time does not relieve the City of its obligations to the EPA or the State of Georgia, does not create any new rights or defenses, and will not affect the EPA's decision to pursue enforcement action.

Please feel free to contact Mr. David Phillips, Enforcement Officer at (404) 562-9773 or by email at phillips.david@epa.gov, if you have questions regarding this notice and information request.

Sincerely,

Denisse D. Diaz, Chief

Clean Water Enforcement Branch

Water Protection Division

## **Enclosures**

cc: Ms. Jane Hendricks
Georgia Environmental Protection Division

Mr. Sheldon Irvin Valdosta, Georgia

## **ENCLOSURE A**

## SSO PROGRAM City of Valdosta, GA

## 1. Provide the following:

- a. The size of the City of Valdosta's Sanitary Sewer Collection System (SSS) (linear feet or miles);
- b. A list of the pump stations in the SSS, including size (gpm), and indicate if back up power is available and if it is adequate to fully operate the pump station;
- c. A list of all constructed overflow points (any unpermitted constructed discharge points) in the SSS (including pump stations) prior to the headworks of the City of Valdosta's WWTPs;
- d. The average design flow of the City of Valdosta's WWTPs;
- e. The peak design flow of the City of Valdosta's WWTPs;
- f. The annual average flow of the City of Valdosta's WWTPs; and
- g. The population served by the City of Valdosta's WWTPs and their respective SSSs.
- 2. For purposes of this Information Request, a sanitary sewer overflow (SSO) is an overflow, spill, release, or diversion of wastewater from the SSS. SSOs include overflows or releases of wastewater that reach waters of the United States (U.S.); overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO.

Provide a listing of all SSOs that occurred from September 2007 to the present. For each SSO provide the following:

- a. Date(s) of the SSO;
- b. Time (and Date if other than a. above) when the City of Valdosta was notified that the SSO event occurred;
- c. Time (and Date if other than a. above) when the City of Valdosta (or contractor) crew responded to the SSO;
- d. Time (and Date if other than a. above) when the SSO ceased;
- e. Time (and Date if other than a. above) when corrective action was completed;
- f. Location of the SSO, including source (pump station, manhole, etc.);
- g. Ultimate destination of the SSO, such as surface waterbody (by name, if available), storm drain leading to surface waterbody (by name, if available), dry land, building, etc.;
- h. Volume of the SSO;
- i. Cause of the SSO such as grease, roots, other blockages, wet weather (infiltration and inflow), loss of power at pump station, pump failure, etc.;
- i. Corrective actions taken to stop the SSO; and
- k. Corrective actions taken to prevent this or similar SSOs in the future.

If available, please provide the above information in a Microsoft compatible spreadsheet format.

3. If the City of Valdosta has a formal written plan for responding to, addressing, and reporting

SSOs (i.e., a Sewer Overflow Response Plan ("SORP")), provide a copy of the plan.

- 4. Provide a copy of any additional City of Valdosta procedures not included in the SORP (as referenced in Question 3 above) for the following activities:
  - a. Documenting SSOs;
  - b. Estimating SSO volume;
  - c. Identifying root causes of SSOs;
  - d. Containment and clean-up of SSOs, including any specific procedures addressing backups into buildings caused by mainline problems;
  - e. Identifying wet weather related SSOs and reconnaissance of these during rain events; and
  - f. All reporting of SSOs to the permitting authority, the State of Georgia.
- 5. Provide the name of the person (or position title) responsible for each of the activities indentified in the City of Valdosta's SORP and/or listed in Question 4 above.

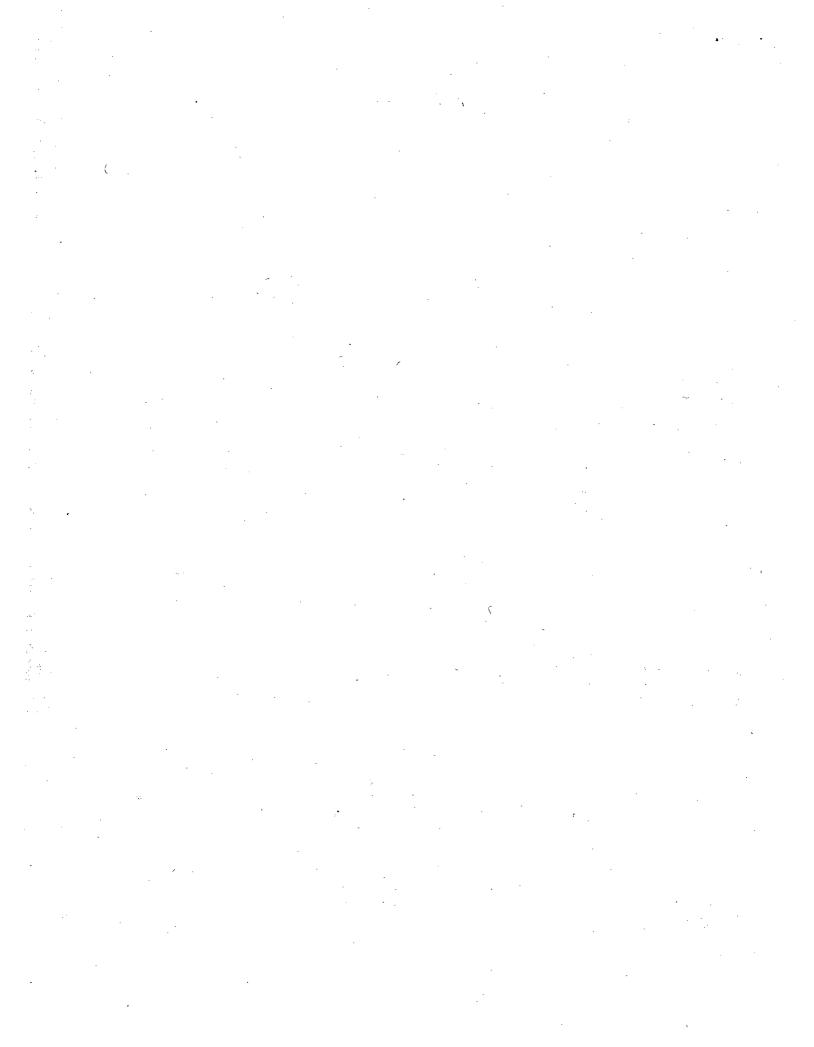
### ENCLOSURE B

## RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS (40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). Method and time of asserting business confidentiality claim. A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.



## Georgia Department of Natural Resources Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334 Judson H. Turner, Director (404) 656-4713

DEC 0 9 2013

Certified Mail
Return Receipt Requested

Honorable John Gayle, Mayor City of Valdosta Post Office Box 1125 Valdosta, Georgia 31603-1125

RE: Consent Order No. EPD-WQ-5478

City of Valdosta Withlacoochee and Mud Creek Water Pollution Control

Plants

Dear Mayor Gayle:

The public notice period for Consent Order No. EPD-WQ-5478 (Order) has ended and EPD received no comments. Therefore, enclosed is a copy of the executed Order. The City of Valdosta will be expected to comply with all conditions of the Order.

Your cooperation in this matter is appreciated.

Sincerely,

Judson H. Turner,

Director

JHT/kh Enclosure ENVIRONMENTAL PROTECTION DIVISION
OF THE
DEPARTMENT OF NATURAL RESOURCES
STATE OF GEORGIA

IN RE: CITY OF VALDOSTA

ORDER NO. EPD-WQ-5478

**CONSENT ORDER** 

WHEREAS, the City of Valdosta (City) was issued National Pollutant Discharge Elimination System (NPDES) Permit Nos. GA0033235 and GA0020222 (Permits) by the Director of the Georgia Environmental Protection Division (Director, EPD) for its Withlacoochee Water Pollution Control Plant (WPCP) and Mud Creek WPCP, respectively, located in the Suwannee River Basin; and

WHEREAS, the Permits authorize the City to discharge treated wastewater according to effluent limitations, monitoring requirements, and other conditions set forth in the Permits; and

WHERAS, from January 1, 2008 to June 30, 2013, the City reported an excessive number of effluent violations of Permit Nos. GA0033235 and GA0020222 (see Attachment 1); and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive number of raw sewage spills from its sanitary sewer collection system to waters of the State (see Attachment 2); and

WHEREAS, Chapter 391-3-6-.05(2)(a) of the Rules and Regulations of the State of Georgia for Water Quality Control (Rules) defines a spill as "any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to the waters of the State"; and

WHEREAS, Chapter 391-3-6-.05(2)(b)(2) of the Rules defines a major spill, in part, as "Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water quality violations in the waters of the State"; and

WHEREAS, the City reported two fish kill events downstream of the November 18, 2009

1

and February 21, 2013 spills; and

WHEREAS, on November 20, 2009 and February 22, 2013, the Wildlife Resources Division investigated the fish kill events (see Attachment 3); and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive number of major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules, from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State (see Attachment 4); and

WHEREAS, Chapter 391-3-6-.05(2)(b)(1) of the Rules defines a major spill, in part, as "The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit of biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids" [amended August 2012]; and

WHEREAS, Chapter 391-3-6-.03(3)(I) of the Rules defines waters of the State as any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation; and

WHEREAS, the spills to State waters documented in Attachments No. 1 and 2 of this Order meet the definition of a spill or major spill; and

WHEREAS, on March 31, 2009, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City's April 1, 2009 and April 14, 2009 letters, an estimated 50,300,000 gallons of raw sewage was discharged to the Withlacoochee River from March 31, 2009 to April 2, 2009; and

WHEREAS, on March 27, 2009, Governor Sonny Perdue declared Lowndes County to

be in a State of Emergency due to heavy rains and severe weather; and

WHEREAS, on April 23, 2009, President Barack Obama declared South Georgia counties, including Lowndes County, federal disaster areas; and

WHEREAS, in July 2009, the City applied for federal funding with the Federal Emergency Management Agency (FEMA) to secure approval of, and funding for, damages to the Withlacoochee WPCP from the flood of March 2009; and

WHEREAS, on December 7, 2009, the Mud Creek WPCP sanitary sewer manhole receiving all influent flow into the WPCP collapsed, along with associated piping, and, according to the City's December 14, 2009 report to EPD, an estimated 5,500,000 gallons of raw sewage spilled into Mud Creek from December 8, 2009 to December 13, 2009 spill; and

WHEREAS, in a letter to EPD, dated January 4, 2010, the City stated that during the December 8-13, 2009 major spill, a major leak was discovered by close circuit television equipment just downstream from one of the plugged influent lines, allowing significant groundwater inflow into the repaired manholes and lines; and

WHEREAS, on January 5, 2010, representatives of the City and EPD held a teleconference to discuss the City's sanitary sewer system; and

WHEREAS, during the January 5, 2010 teleconference, the City advised EPD of work completed on the sanitary sewer system, various initiatives implemented by the City since October 2008, and the City's commitment to continue to address its sanitary sewer system issues; and

WHEREAS, in a correspondence, dated January 6, 2010, the City submitted to EPD a Sanitary Sewer Condition Assessment and Rehabilitation Program, Condition and Criticality Report, and Sewer System Modeling and Capacity Evaluation Report (Assessment Program); and

WHEREAS, the City completed construction of the renovated Mud Creek WPCP

WHEREAS, on April 6, 2010, representatives of the City and EPD held a teleconference to discuss clarification of the City's Assessment Program and to request the City to submit updated schedules for completion of specific sewer system projects; and

WHEREAS, on April 21, 2010, at the request of the City, representatives of the City and EPD met to further discuss corrective actions to address the City's sanitary sewer system, the amount of work the City has completed with regard to its sewer system, and the City's commitment to continue to address its sanitary sewer system; and

WHEREAS, in April 2012, the City completed the renovation and expansion of the Mud Creek WPCP. Since completion of the renovations and expansion, the Mud Creek WPCP has met permit effluent limitations for pollutant parameters; and

WHEREAS, on August 1, 2012, the City was denied federal funding from FEMA; and

WHEREAS, according to the City, the denial followed a final appeal prepared by FEMA staff and FEMA's external consultant, in which they concluded the proposed project to build a new force main system, equalization basin, headworks and relocation of the WPCP was eligible, feasible and cost effective; and

WHEREAS, in a letter dated October 23, 2012, the United States Environmental Protection Agency Region 4 (EPA) submitted a request to the City, under Section 308 of the Clean Water Act, for information regarding the Withlacoochee WPCP, the Mud Creek WPCP, and their associated sanitary sewer collection systems; and

WHEREAS, on February 28, 2013, at the City's request, the City met with EPA to discuss the City's sanitary sewer system issues and plans to address those issues, including funding alternatives and timelines of completion. In addition, the City requested that EPA allow them to work directly with EPD on a corrective action plan; and

WHEREAS, on February 28, 2013, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather; and

WHEREAS, on March 13, 2013, a meeting was held between the City and EPD to discuss recent flooding issues at the Withlacoochee WPCP and the City's plans to address its sanitary sewer system issues, including specific projects, timelines and funding sources, as well as a proposed corrective action plan; and

WHEREAS, in a letter to EPD, dated March 14, 2013, the City stated that due to the flooding on February 28, 2013 the Withlacoochee WPCP was taken offline from February 28, 2013 to March 3, 2013 and as a result an estimated 19,150,000 gallons of raw sewage was discharged to the Withlacoochee River; and

WHEREAS, on March 19, 2013, EPA and EPD held a teleconference to discuss the City's response to EPA's October 23, 2012 Section 308 information request and corrective actions to address the City's sanitary sewer system issues; and

WHEREAS, on April 10, 2013, the City submitted to EPD a document titled "Corrective Action Plans and Schedules" which includes completion dates for corrective actions within the City's sanitary sewer collection system and relocation of the Withlacoochee WPCP (see Attachment 6); and

WHEREAS, on April 11, 2013, following review of the City's response to the Section 308 information request, EPA submitted to EPD via electronic mail comments regarding the City's "Sewer Overflow Response and Reporting Procedures" (see Attachment 5a); and

WHEREAS, on April 15, 2013, the City submitted via electronic mail a list of sanitary sewer projects completed by the City from 2009 to present with a total expenditure amount of \$49,453,784 (see Attachment 7), including the renovation and expansion of the Mud Creek WPCP, which was completed in April 2012; and

WHEREAS, on April 23, 2013 the City submitted via electronic mail an interim plan for meeting permit compliance at the existing Withlacoochee WPCP; and

WHEREAS, according to the City, on April 25, 2013, the Mayor and City Council adopted a five (5) year action plan to address the City's sanitary sewer system issues, including the relocation of the Withlacoochee WPCP; a new force main to the Withlacoochee WPCP; an equalization basin; a new headworks facility at the Withlacoochee WPCP; inspection of all sewer lines and manholes with associated repairs; and short term improvements to the existing Withlacoochee WPCP; and

WHEREAS, on September 11, 2013 the City transmitted to EPD via electronic mail a revised "Sewer Overflow Response and Reporting Procedures" in response to EPA's and EPD's comments (See Attachment 5b); and

WHEREAS, Part II.A.1. of the Permits requires the permittee to maintain and operate as efficiently as possible all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with the permit; and

WHEREAS, Section 12-5-29(a) of the Georgia Water Quality Control Act (Act) makes it unlawful to use any waters of the State to dispose of sewage or other wastes, except in such a manner as to conform and comply with the Code and all rules, regulations, orders, and permits established under the Code; and

WHEREAS, Section 12-5-23(c)(12) of the Act provides the Director the authority to issue orders as may be necessary to control, abate, and prevent pollution of the waters of the State; and

WHEREAS, Section 12-5-52(a) of the Act specifies that any person violating the Code or any permit condition or limitation established pursuant to the Code shall be liable to the State of Georgia for a civil penalty not to exceed \$50,000 per day for each day during which such violations continue; and

WHEREAS, the spills and Permit violations addressed in this Order are violations of the Permits, Rules, and Act.

## NOW THEREFORE, the Director ORDERS and the City AGREES as follows:

- 1. Allocate, at a minimum, \$200,000 to complete a Supplemental Environmental Project (SEP). The SEP must go beyond standard compliance requirements and should result in improvement to water quality or water conservation. Any proposed SEP should not be part of a plan or requirement that the City is already in the process of implementing or that is otherwise required in order to comply with the Georgia Water Quality Control Act. Within sixty (60) days of the execution date of this Order, submit to EPD for review and approval a SEP plan and schedule with a completion date no later than December 31, 2016. Once approved by EPD, the SEP plan and schedule will become part of the Order.
- Complete the relocation of the Withlacoochee WPCP in accordance with the construction deadline as described in Action Item 1a and 1b in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the interim plan for meeting permit compliance at the existing Withlacoochee WPCP, submitted to EPD on April 23, 2013.
- 4. Complete Action Item Nos. 2-5 in accordance with the completion deadlines listed in Attachment 6 of this Order.
- 5. Upon EPD written approval, immediately implement the revised "Sewer Overflow Response and Reporting Procedures", submitted to EPD via electronic mail on September 11, 2013.
- 6. Submit to EPD semi-annual progress reports for the SEP listed in Condition 1 this Order, and action items listed in Attachment 6 of this Order, by June 30<sup>th</sup> and December 31<sup>st</sup> of each year.

- 7. Consistent with timely review and approval by EPD, all plans, procedures, and schedules required by or referenced in this Order, are upon approval by EPD, incorporated into this Order. The City shall implement all approved plans, procedures, and schedules.
- 8. Upon receipt of any report, plan, or schedule; or any portion of a report, plan, or schedule; or any revised report, plan, or schedule; or any revised portion of a report, plan, or schedule; or any written response (hereinafter collectively "document") required under this Order, EPD shall review said document to determine its completeness with regard to the Act, Permit, and this Order. If EPD determines that said document is complete, EPD shall notify the City in writing that said document is approved. If EPD determines that said document is incomplete, EPD shall provide the City with written notice of any deficiencies. The City shall have sixty (60) days from receipt of the written notice of deficiencies to submit a modified document to EPD unless otherwise specified by EPD. Should the City take exception to all or part of EPD's notice of deficiencies, the City shall, within fifteen (15) days after receipt of the written notice of deficiencies, submit to EPD a written statement of the grounds for the exception. EPD and the City shall confer by telephone or in person in an attempt to resolve any disagreement. If agreement is reached, the resolution shall be written and signed by representatives of each party. If agreement cannot be reached within thirty (30) days from the date of the City's receipt of the notice of deficiencies unless otherwise specified by EPD, the City shall revise the document as required by EPD and resubmit the revised document in accordance with a schedule to be specified by EPD

This Order does not waive EPD's authority to take further enforcement action, or imply

that EPD will not take such action, if the City (1) fails to meet applicable Permit effluent limits, (2) or the City does not fully satisfy the conditions of the Order, or (3) fully comply with other relevant requirements.

This Order is not a finding, adjudication of, or evidence of a violation of any State law by the City nor does the City by its consent agree to any violations of State laws nor admit any liability to any third party or parties.

This Order does not relieve the City of any obligation or requirements of the Permits.

This Order is final and effective immediately, and shall not be appealable, and the City waives any hearing on its term and conditions.

It is so ORDERED, CONSENTED, and AGREED TO this He day of December.

2013.

FOR THE DIVISION:

Judson H. Turner

Director

FOR THE CITY

BY (print name): He

SIGNATURE

TITLE: UTILITY

DATE: <u>Sciptember 23,2013</u>

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## ATTACHMENT 1

Permit Effluent Limitation Violations
Withalcoochee WPCP (GA0033235) and Mud Creek WPCP (GA0020222)
January 2008 to July 2013

# City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

## Withlacoochee WPCP GA0033235

<u>Parameter</u> .	Date F		Reported Value
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Feb-08	1706	1970
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-08	30	44.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-08	45	141
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-08	1365	2458
Total Suspended Solids Weekly Maximum Loading, kg/Day	Feb-08	1706	7814
Total Suspended Solids Percent Removal	Feb-08	85%	80.8%
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-08	1706	2315
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-08	400	1041
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Aug-08	379	623°
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	1137	1311
Dissolved Oxygen Minimum, mg/L	Apr-09	5.0	3.0
Total Suspended Solids Weekly Maximum Concentration, mg/L	Apr-09	45	59.6
Total Suspended Solids Weekly Maximum Loading, kg/Day	Apr-09	1706	3355
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Apr-09	400	58281
Toda Comorni VVocity Maximum Coombaro Modif, Cr C/ 100 ME	7100	700	00201
Ammonia Weekly Maximum Concentration, mg/L	May-09	6.4	7
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Jan-10	.853.	970
Total Suspended Solids Weekly Maximum Concentration, mg/L	Jan-10	45	62
Total Suspended Solids Weekly Maximum Loading, kg/Day	Jan-10	1706	3396
Ammonia Weekly Maximum Concentration, mg/L	May-10	6.4	15.7
Ammonia Weekly Maximum Loading, kg/Day	May-10	204	*
Ammonia Weekly Maximum Loading, kgrbay	Way-10	207	,000
Ammonia Monthly Average Concentration, mg/L	Aug-11	2.0	2.9
Ammonia Weekly Maximum Concentration, mg/L	Aug-11	3.0	4
Ammonia Weekly Maximum Loading, kg/Day	Aug-11	76.0	80.1
Ammonia Weekly Maximum Concentration, mg/L	Sep-11	3.0	3.6
7 anniona vvooriy maximani consoniation, mg, 2	00p . 1	0.0	0.0
Ammonia Weekly Maximum Concentration, mg/L	Jul-12	3.0	3.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Sep-12	4.0	4.4
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Sep-12	6.0	8.3
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Sep-12	152	180.3
Ammonia Weekly Maximum Concentration, mg/L	Sep-12	3.0	3.5
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Sep-12	400	457.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Oct-12	4.0	4.5
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Oct-12	6.0	8.7
Ammonia Weekly Maximum Concentration, mg/L	Oct-12	3.0	5.8
Ammonia Weekly Maximum Loading, kg/Day	Oct-12	76	86.6
Animonia Weekly Waxiinum Loading, kg/Day	OU[-12	10	00.0

## City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013.

Withlacoochee WPCP GA0033235, cont.	<i>.</i>		
	•		
<u>Parameter</u>		<u>mit Limit</u> Rep	
pH Minimum, S.U.,	Jan-13	6.0	4.5
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-13	30	67.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-13	45	98.3
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-13	1365	2476.0
\ \	, 00 10	.000	2170.0
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Mar-13	1706	3542.6
Total Suspended Solids Weekly Maximum Concentration, mg/L	Mar-13	45	149.4
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-13	1706	14624
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-13	400	35283
· · · · · · · · · · · · · · · · · · ·	r.		
Mud Creek WPCP GA0020222			
•		21 1 1	
<u>Parameter</u>		mit Limit Rep	
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	458	654
Effluent Flow Monthly Average, MGD	Jan-10⊧	3.22	3.23
		•	
Effluent Flow Monthly Average, MGD	Mar-10	3.22	3.3
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Oct-10	400	1158
Tedar delinerin vveckiy maximum dedineme mean, er er toe me	000 10	400	
Ammonia Monthly Average Concentration, mg/L	Nov-10	1.5	3.8
Ammonia Weekly Maximum Concentration, mg/L	Nov-10	2.25	12.2
Ammonia Monthly Average Loading, kg/Day	Nov-10	.18	60.6
Ammonia Weekly Maximum Loading, kg/Day	Nov-10	23	108.6
Effluent Flow Monthly Average, MGD	Feb-11	3.22	3.3
Effluent Flow Monthly Average, MGD	Mar-11	3.22	σ <b>3.3</b>
Lindent Flow Monthly Average, MGD	IVIQI - I I	J. Z.Z.	0.0
Effluent Flow Monthly Average, MGD	Mar-12	3.22	3.3
Effluent Flow Weekly Maximum, MGD	Mar-12	4.03	4.8
		0.00	
Effluent Flow Monthly Average, MGD	Mar-13	3.22	3.3
Effluent Flow Weekly Maximum, MGD	Mar-13	4.03	6.2
Effluent Flow Monthly Average, MGD	Jul-13	3.22	3.4

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## ATTACHMENT 2

City of Valdosta Raw Sewage Spills January 1, 2008 to July 31, 2013

BEGIN DATE	wATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
	TRIBUTARY TO JOREE MILL POND			HEAVY RAIN, PRESSURE ALSO CAUSED FAILURE TO
2008-02-21	TO TWO MILE BRANCH	817 GORNTO ROAD	6,000	PREVIOUS SEWER REPAIR
	STILLHOUSE BRANCH TRIB TO			
2008-02-21	WITHLACOOCHEE RIVER	3500 COUNTY CLUB ROAD	6,000	HEAVY RAINFALL
lander of the second of the se	DUKES BAY CANAL TRIBUTARY TO	Strategeren.	ender Manyly	The second secon
2008-02-21	MUD CREEK	108 TUCKER ROAD	18,000	HEAVY RAINFALL
2008-02-21	KNIGHTS CREEK	1001 PONDEROSA DRIVE	22,000	HEAVY RAINFALL
2008-02-22	TWO MILE BRANCH	608 HOWELL BROOK DRIVE	35,000	OVERLOAD DURING HEAVY RAIN
2008-08-23	KNIGHTS CREEK	1001 PONDEROSA DRIVE	24,000	INFLOW
2008-11-30	WITHLACOOCHEE RIVER	HIGHWAY 133 @ I-75 EXIT 18	135,000	HEAVY RAINFALL
2009-02-19	TRIBUTARY TO CHERRY CREEK	LAKE LAURIE DRIVE	500	SANITARY OVERFLOW/ ELECTRICAL PUMP FAILURE
2009-04-03	SUGAR CREEK	2408 MEADOWBROOK DRIVE	10,001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2310 PARK LANE	10,001	EXCESSIVE RAIN
2009-04-03	ONE MILE BRANCH	1212 WAINWRIGHT DRIVE @ OLD SUGAR CREEK WWTP	10,001	EXCESSIVE RAIN
2009-08-13	SUGAR CREEK	1314 BAYTREE ROAD	18,900	MANHOLE FALLEN INTO STREAM
2009-08-18	UNNAMED TRIBUTARY	KINDERLOU LIFT STATION	5,500	ELECTRICAL- DUE TO SCADA FAILURE
2009-08-26	DUKES BAY CANAL	210 DAMPIER STREET	3,000	GREASE BLOCKAGE
2009-11-11	SUGAR GREEK	1825 NORMAN DRIVE	14,000	BLOCKAGE OF GREASE AND RAGS
2009-11-18	ONE MILE BRANCH	1409 NORTH ASHLEY STREET	7,500	STORM WATER PIPE BROKE SEWER LINE

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2009-12-02	TWO MILE BRANCH	2408 NORTH PATTERSON	9,000	GREASE BLOCKAGE
2009-12-02	SUGAR CREEK	1825 NORMAN DRIVE	6,000	BLOCKAGE IN SEWER MAIN
2009-12-03	SUGAR CREEK	1815 NORMAN DRIVE	9,999	BLOCKAGE AND EXCESSIVE RAIN
2009-12-08	MUD CREEK	MUD CREEK WWTP	550,000	COLLAPSED MANHOLE
2009-12-09	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/EXCESSIVE RAIN/CLOGGED PUMPS
2009-12-10	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/HEAVY RAINS/CLOGGED PUMPS
2009-12-11	MUD CREEK	MUD CREEK WWTP	1,350,000	DAMAGED MANHOLES
2009-12-12	MUD CREEK	MUD CREEK WWTP	950,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-13	MUD CREEK	MUD CREEK WWTP	350,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-22	SUGAR CREEK	1825 NORMAN DRIVE	14,000	GREASE AND RAGS
2010-01-21	TRIBUTARY TO KNIGHTS CREEK	1001 PONDEROSA DRIVE	12,100	INFLOW AND INFILTRATION (I&I), HEAVY RAIN
2010-01-21	DUKES BAY	700 ROGERS STREET	600	I&I, HEAVY RAIN
2010-01-21	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	138,000	I&I, HEAVY RAIN
2010-01-21	TRIBUTARY TO AN UNNAMED STREAM	700 CYPRESS STREET	64,000	I&I, HEAVY RAIN
2010-01-21	SUGAR CREEK	2408 MEADOWBROOK DRIVE	450,000	i&i, HEAVY RAIN
2010-01-21	DUKES BAY	400 SOUTH OAK STREET	6,000	I&I, HEAVY RAIN

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-01-21	TRIBUTARY TO TWO MILE BRANCH	817 GORNTO ROAD	20.350	I&I, HEAVY RAINS
	the state of the s		rigge an energy and the second and t	And the second s
2010-01-25	DUKES BAY CANAL	701 CYPRESS STREET	34,000	MANHOLE COLLAPSED
2010-04-04	TWO MILE BRANCH	2408 NORTH PATTERSON STREET	4,000	GREASE BLOCKAGE
2010-04-18	TRIBUTARY TO KNIGHTS CREEK	1201 PONDEROSA DRIVE	500	GREASE BLOCKAGE
2010-04-29	DUKES BAY CANAL	TUCKER ROAD	3,000	LINE BLOCKAGE
2010-06-14	DUKES BAY CANAL	613 SOUTH PATTERSON STREET	3,240	BROKEN PIPE
2010-09-27	ONE MILE BRANCH	212 EAST COLLEGE STREET	1,100	181
2010-09-29	SUGAR CREEK	1423 GORNTO ROAD	75,000	(&) DUE TO EXCESSIVE RAIN
2010-09-29	TRIBUTARY TO KNIGHTS CREEK	1003 PONDEROSA DRIVE	27,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	ONE MILE BRANCH	212 EAST COLLEGE STREET	6,000	I&I DUE TO EXCESSIVE RAIN
2011-01-18	TRIBUTARY TO CHERRY CREEK	4036 BEMISS ROAD	27,000	GREASE BLOCKAGE
2011-02-07	THREE MILE BRANCH	825 NORTHWOOD PARK DRIVE	187,660	COLLAPSED SEWER
2011-10-12	TWO MILE BRANCH	2501 NORTH PATTERSON STREET @ PENDLETON DRIVE	500	GREASE BLOCKAGE
2011-10-13	TRIBUTARY TO LAKE SHERI	1307 NORTH SAINT AUGUSTINE ROAD	4,600	RAG BLOCKAGE

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2011-11-29	SPRINGHOUSE CREEK	3350 PLANTATION DRIVE	9,000	BYPASS PUMP HOSE CONNECTION FAILURE
2012-03-03	CHERRY CREEK	4119 BEMISS ROAD BEMISS ROAD PUMP STATION	24,000	PUMP STATION OVERLOADED BY HEAVY RAINS
2012-03-03	SUGAR CREEK	2412 MEADOWBROOK DRIVE	12,000	HYDRAULIC OVERLOAD
2012-03-08	TRIBUTARY TO KNIGHTS CREEK	301 SOUTH BLANCHARD STREET	189,000	COLLAPSED SEWER MAIN
2012-06-05	TWO MILE BRANCH	NORTH ASHLEY STREET	1,800	SEWER BROKEN BY CONTRACTOR
2012-06-26	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,000	EXCESSIVE RAIN FROM TROPICAL STORM DEBBY
2012-07-11	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,000	EXCESSIVE RAIN
2012-08-07	CHERRY CREEK	4119 BEMISS ROAD	1,000	LEAKING PUMP
2012-08-16	WITHLACOOCHEE RIVER	EXIT 18 @ HIGHWAY 133	2,500,000	PUMP STATION FAILURE
2012-08-16	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,500,000	BOTH PUMPS AT PUMP STATION FAILED
2013-02-21	KNIGHTS CREEK	3891 INNER PERIMETER ROAD	20,000	GREASE BLOCKAGE
2013-02-25	CHERRY CREEK	4119 BEMISS ROAD	173,000	HYDRAULIC OVERLOAD
2013-02-25	SUGAR CREEK	626 SCOTT DRIVE	720,000	EXCESSIVE RAIN
2013-02-25	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,290,000	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	ROUSE ROAD	590,500	EXCESSIVE RAIN
2013-02-25	TWO MILE BRANCH	2420 MEADOWBROOK DRIVE	936,000	EXCESSIVE RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2013-02-25	TWO MILE BRANCH	817 GORNTO ROAD	53,750	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	1248 NORTH LEE STREET	19,200	EXCESSIVE RAIN
2013-02-25	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST	124,500	EXCESSIVE RAIN
2013-02-26	ONE MILE BRANCH	JOREE STREET	29,000	EXCESSIVE RAIN
2013-02-28	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,750,000	I&I, FLOODING FROM RAIN
2013-03-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	I&I, EXCESSIVE RAIN
2013-03-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	EXCESSIVE RAIN
2013-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,400,000	EXCESSIVE RAIN
2013-03-04	DUKES BAY CANAL	1810 SOUTH PATTERSON STREET	100,000	RUPTURED SEWER MAIN
2013-03-24	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST OF WITHLACOOCHEE RIVER BRIDGE	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1423 GORNTO ROAD	.20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	2412 MEADOWBROOK DRIVE	360,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	, 626 SCOTT DRIVE	300,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1404 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-07-22	TWO MILE BRANCH	2400 NORTH PATTERSON STREET	2,050	GREASE
2013-07-31	SUGAR CREEK	2400 MEADOWBROOK DRIVE	2,000	POSSIBLE BLOCKAGE, UNDER INVESTIGATION

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY REPORTED CAUSE	
2012 07.21	LUCUTOMER CREEK	COO CCOTT DDIVE	2 COO POSSIBLE PLOCKAGE	
2013-07-31	HIGHTOWER CREEK	600 SCOTT DRIVE	2,000 POSSIBLE BLOCKAGE	

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### **ATTACHMENT 3**

EPD Fish Kill Investigations November 20, 2009 and February 22, 2013 Fish Kill Investigation: One Mile Branch In Lowndes County, Georgia On November 20, 2009

> By Jeremy Wixson

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region
Fitzgerald, Georgia

November 24, 2009

On Thursday November 19, 2009 at 3:45 p.m., Bill Noelle (404-362-2624) of Georgia EPD telephoned the Bowen's Mill Office to notify us of a fish kill in the city of Valdosta in Lowndes County Georgia. Marty Snowden took the call and linked me in the field to let me know. I was planning to sample fish that night and was not able to get to Valdosta before dark. I telephoned Bill Noelle and left a message for him on Friday November 20, 2009. I then telephoned John Waite (229-292-0842 cell, jwaite@valdostacity.com), Environmental Manager with the City of Valdosta. John informed me that there had been a break in a wastewater line that occurred in the Coca-Cola Bottling Plant parking lot. The leak was first discovered by a work detail cleaning One Mile Branch. The City dispatched utility crews to determine the cause and make repairs to the line. It was an 8-inch vitrified clay pipe and the water in it was coming from businesses in the area including a large laundromat. They discovered the broken pipe on Wednesday November 18, 2009. To fix the pipe, they dammed up One Mile Branch just below the site the wastewater was entering the branch, and used a gasoline pump to pump the water back into the sewage system. They estimated that approximately 7,500 gallons was discharged to the Branch before they got the pump in place. On Thursday November 19, 2009, Utility Department staff was checking the Branch downstream of the break and noticed some dead fish in One Mile Branch. They called EPD, who in turn called us. Bill Noelle indicated that EPD staff would be investigating on November 20, 2009 as well.

Edward Zmarzly and Jeremy Wixson went to the location of the fish kill on November 20<sup>th</sup> and took water quality measurements at the North Lee Street crossing (Figure 1, WQ station 1) at 1230 hours, at the break site (Figure 1, WQ station 2) at 1244 hours, and at the Williams Street Crossing (Figure 1, WQ station 3) at 1348 hours. Water was flowing slowly in the branch, and in all locations live fish were observed. We then went to the site of the broken sewer line and began counting the fish observed according to species and size, working our way downstream until we no longer observed dead fish. The kill area was spread out from the location of the broken sewer line (Figure 1, purple marker by WQ station 2) to 0.69 miles downstream on the Valdosta State University Campus (Figure 1, purple marker between WQ stations 3 and 4). When we finished taking inventory of the dead fish, we went downstream to take a final set of water quality readings at the West Gordon Street Crossing (Figure 1, WQ station 4) at 1610 hours. We were unable to determine if the fish kill was a direct result of the broken pipe's effluent or from installation of a temporary dam used to catch the effluent.

We measured basic water quality with a YSI model 550 oxygen meter and a Hach portable water test kit model FF-1 (Table 1). Dissolved oxygen was lowest at the WQ station 1, which was a little shallower and slower moving than the other stations. The pH was highest at the location of the sewage line break (WQ station 2), but had become more neutral by the time it reached WQ station 3.

In total we found 510 dead fish with a total value of \$186.45 (Table 2), there was one crayfish also dead in the area. The cost of investigating the fish kill (Table 3) was \$1,215.99. The total value of the fish kill including the cost of investigation and the value of the fish killed was \$1,402.44.



Figure 1. Map of One Mile Branch area of fish kill investigation.

Table 1. Water quality measurements made during the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Station Number and Location	Time (hrs)	Depth (ft)	Temperature (°C)	DO (ppm)	pН	Hardness (ppm)	Alkalinity (ppm)	Dead Fish
1. N Lee Street 30.84862° N 83.27824° W	1230	Surface	16.1	3.3	7	48	12	NO
2. Marion Street 30.84755° N 83.27940° W	1244	Surface	21.7	5.5	9	60	24	YES
3. Williams Street 30.84748° N 83.28365° W	1348	Surface	16.3	4.2	6.5	44	24	YES
4. W Gordon Street 30.84041° N 83.30654° W	1610	Surface	17.5	8.15	6.5	36	24	NO

Table 2. Number and monetary value of dead fish from the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

		•
Species	Number of Dead Fish	Value (in dollars) <sup>a</sup>
American Eel	1	2.37
Anguilla rostrata		
Golden Shiner	35	7.75
Notemigonus crysoleucas	·	
Bullhead Catfish	62	68.56
Ameiurus spp.		
Mosquitofish	196	* 25.48
Gambusia spp.		•
Bluegill	156	54.55
Lepomis macrochirus		,
Redbreast Sunfish	59	27.44
Lepomis auritus		
Spotted Sunfish	1	0.30
Lepomis punctatus	• • • • • • • • • • • • • • • • • • •	
Total	510	186.45

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

Table 3. Costs for the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Item	Amount	Cost (\$)
Personnel <sup>a</sup>	II	
PS: Nat Res Biologists (WL)	20 hours	584.00
TS: Natural Resources Tech (AL)	21 hours	506.94
Vehicles		
129772	191 miles	105.05
Other	•	
Supplies	1 set	20.00
Total		\$1215.99

<sup>&</sup>lt;sup>a</sup> Cost includes fringe benefits

# REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water		Ē	River) 3 <b>0.84755</b>	° N, 83	3.27940° W	Separate Company	R RIVER BASIN
NEAREST TOWN			in	COUNT			OF KILL
Valdosta			- Hintiggreen teaming	Lowr	ıdes	Nove	ember 18, 2009
TYPE OF WATER BODY			, 1	DURAT	ION OF KILL (If know	vn).	
☐ RIVER OR STREAM	LAKE/POND		ESTUARY	DAYS/F	iours Severa	l hour	<b>'S</b> .'
F	OLLUTI	ONS	OURCE - TY	PE O	F OPERATION	NC	terre con a seema Ali isin tiranbidayaan
AGRICULTURAL OPERATION	ONS.	- Hone stated and all the state of	INDUSTRI	AL OPER	ATIONS		MUNICIPAL OPERATIONS
☐POISONS (pesticides) ☐FERTILIZERS ☐ MANURE DRAINAGE, ENSILA LIQUORS, OR FEED LOT OPE ☐ HANDLING OF EQUIPMENT A CONDITIONS ☐ OTHER	RATIONS	MET RUB	D & KINDRED ALS BER & PLASTICS MICALS ROLEUM	□ LE P □ P/ □ LL _ F	EXTILES EATHER & LEATHER RODUCTS APER & ALLIED RODUCTS JMBER & WOOD PRODUCTS AND & GRAVEL		SEWERAGE SYSTEMS  □ REFUSE DISPOSAL  □ WATER SYSTEM □ SWIMMING POOL □ POWER SYSTEM □ PEST CONTROL □ OTHER
TRANSPORTATION OPERAT	OR BOAT		NGEMENT/ENTRAINI STRUCTION	OTHER	M DESIGN ☐ OTHER	**************************************	UNKNOWN
SPECIFIC POLL	UTANT	OR FA	ACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC
☐ NUTRIENTS ☐ RADIONUCLEIDES ☐ TEMPERATURE ☐ CYANIDES AND PHENOLS	SEDIME	EUM (OIL NTATION/	& GREASE)	PES MIX	YGEN DEFICIENCY STICIDES, HERBICID KED CHEMICALS HER (specify):	ES, ETC	□ pH □ TURBIDITY ☑ UNKNOWN
EXTENT OF AREA AF	FECTED	7 1	ESTIMATED OR A	CTUAL			KILLED (If known)
MILES OF STREAM 0.69	ACRES OF	LAKE	510 - direct	······································	, .	p., Mo	den Shiner, squitofish, Bluegill, n, Spotted Sunfish
SEVERITY	IOD ⊠I	.IGHT	VALUE OF FISH K	ILLED			
ADDITIONAL REMARKS (Include e Saw one dead Crayfish.	ffects on othe	r than fish	n, e.g., shellfish, wate	rfowl, etc	:.)		
Jeremy Wixson		Bowens Id, GA	ING ADDRESS AND S Mill Highway 31750		IUMBER .		November 24, 2009
EPD FOLLOW-UP INVESTIGATION	REFERRED T	o:	ACTIONS TAKEN (If	known) (E	EPD)		WQMU (EPD)



# WILDLIFE RESOURCES DIVISION

MAR K WILLIAMS COM MISSIONER

DAN FORSTER DIRECTOR

March 11, 2013

ELDWARMUS.

MAR I STORY

RECEIVED

**MEMORANDUM** 

TO:

Jane Hendricks

EPD - Wastewater Regulatory Program

Marzieh Shahbazaz

EPD - Permitting, Compliance, and Enforcement

FROM:

Matt Thomas

Assistant Chief of Fisheries

SUBJECT:

Fish Kill - Knights Creek

Lowndes County, Georgia

February 22, 2013

Attached is copy of subject fish kill investigation report for your files. Please call me if you have questions.

:mt

ce: John Biagi
Bert Deener

Attachment

# Fish Kill Investigation in Knights Creek In Lowndes County, Georgia February 22, 2013

by Bryant Bowen

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region IV
Waycross, Georgia

Chad Sexton received notification of a fish kill in Knights Creek, Lowndes County on February 22, 2013 around 0945 hours from John Waite (229.292.0842) of Valdosta Water and Sewerage Department resulting from a sewage spill. The spill reportedly started around 2130 hours on February 20, 2013. The city located the spill at 1030 hours February 21, 2013 near the Chadwyck subdivision and repaired the overflowing manhole around 1430 hours. Mr. Waite reported an estimated 20,000 gallons of sewage spilled. Mr. Waite also reported that the department flushed the canal, with treated water, overnight using a nearby fire hydrant. Valdosta Water and Sewerage Department personnel picked up and iced around 30 dead fish on February 21, 2013. After receiving all pertinent information from Mr. Waite and gathering necessary equipment and additional staff, Jason Mitchell and Chad left Waycross to investigate.

Chad and Jason arrived at 1230 hours at the intersection of Inner Perimeter Road and Tyndall Dr. near the origin of the spill (Fig. 1). At this point, it started raining and continued to rain throughout the investigation. Mr. Waite met Chad and Jason around 1315 hours at Site #1 (Fig. 1) and reported that EPD had already been contacted. He relayed the spill history and actions taken by his department and handed over the previously collected dead fish. Based on Mr. Waite's information, there was nowhere to take water quality above or near the spill origin; which was a clogged manhole that overflowed municipal sewage into a ditch with little water in it. Here they encountered the remnants of the spill: the smell of raw sewage and visual debris. They measured basic water quality at all of the rest of the sites using a YSI model 85 oxygen/conductivity meter, a Hach portable water test kit model FF-1, and a YSI model 60 pH meter. They noted that the total hardness and specific conductance readings were elevated at the first site and dropped as they moved downstream. At the time of the investigation, none of the water quality readings were at levels typically capable of killing fish. Water temperatures dropped as they moved downstream, likely because of the heavy rainfall.

Jason and Chad counted and/or collected every visible dead fish between the spill origin and Site #2 (Jaycee Shack Road) but were unable to collect dead fish between Sites #2 and #3 due to lack of access, deeper water, and an impenetrable understory. Therefore, the number of dead fish was estimated using an expansion factor. The expansion factor was determined by dividing the total number of segments by the number of segments in which fish were collected. In this case, we had 5 total segments and were able to collect fish from 2 of those. This provided us with an expansion factor of 2.5.

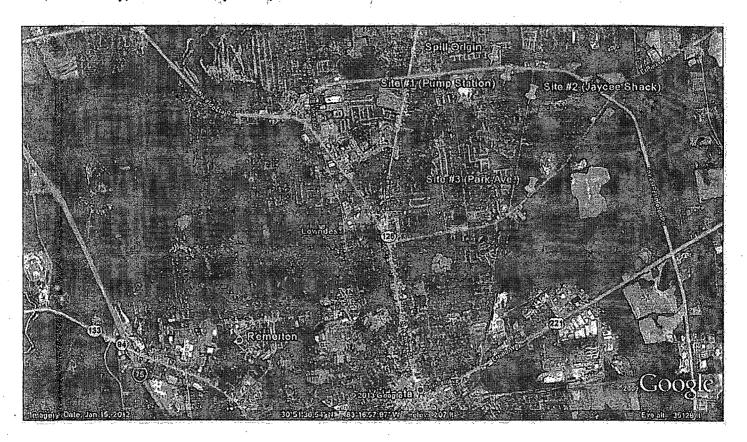
They observed no live fish at any of the 3 sites, mainly because of the reduced visibility caused by the heavy rainfall. The water quality at the last site had improved and no dead aquatic organisms were detected within 200 ft. upstream of Park Avenue. Therefore we determined this was the terminus of the 1.58 mile long fish kill. It was at this point that the field investigation ended. Due to heavy rainfall, Chad and Jason returned to the Waycross Regional Fisheries Management Office to work up all collected dead fishes with Bert Deener.

The initial cause of the fish kill appears to be an oxygen depletion caused by overloading of nutrients from raw sewage into Knights Creek. The system was also flushed with treated city drinking water from a fire hydrant. The total estimated number of fish killed was 469, and the value of these fish was \$219.59 (Table 2). Additionally, 17 crayfish and 16 bullfrog tadpoles were killed. The cost of the investigation was \$845.36 (Table 3). The total cost of the dead fish and the investigation was \$1064.95.

# REPORT OF POLLUTION-CAUSED FISH KILL

Knights Creek  NEAREST TOWN  Valdosta  TYPE OF WATER BODY  □ RIVER OR STREAM □ LAKE/POND □ ESTUARY  DAYS/HOURS ~ 18 IN  POLLUTION SOURCE - TYPE OF OPERATIONS	DATE 0 2/20 ·	aha / Suwanee of KILL 2/21/2013
Valdosta  TYPE OF WATER BODY  ☑ RIVER OR STREAM ☐ LAKE/POND ☐ ESTUARY  DAYS/HOURS ~ 18 In  POLLUTION SOURCE - TYPE OF OPERATION  OF KILL (If known of kill	2/20 ·	
TYPE OF WATER BODY  RIVER OR STREAM  LAKE/POND  ESTUARY  DAYS/HOURS ~ 18 F	vn)	- 2/21/2013
☐ RIVER OR STREAM ☐ LAKE/POND ☐ ESTUARY DAYS/HOURS ~ 18 F	•	"" ""
POLLUTION SOURCE - TYPE OF OPERATION	ırs.	
	at the same	· · · · · · · · · · · · · · · · · · ·
AGRICULTURAL OPERATIONS INDUSTRIAL OPERATIONS	ON	the street of th
,		MUNICIPAL OPERATIONS
□POISONS (pesticides)       □ MINING       □ TEXTILES         □ FERTILIZERS       □ FOOD & KINDRED       □ LEATHER & LEATHER         □ MANURE DRAINAGE, ENSILAGE       PRODUCTS       □ PRODUCTS         □ LIQUORS, OR FEED LOT OPERATIONS       □ METALS       □ PAPER & ALLIED         □ HANDLING OF EQUIPMENT AND       □ RUBBER & PLASTICS       □ PRODUCTS         □ CHEMICALS       □ LUMBER & WOOD       □ PRODUCTS         □ OTHER       □ OTHERS:       □ SAND & GRAVEL		
TRANSPORTATION OPERATIONS  OTHER  RAIL TRUCK BARGE OR BOAT MPINGEMENT/ENTRAINMENT/DAM DESIGN CONSTRUCTION OTHER		UNKNOWN
SPECIFIC POLLUTANT OR FACTOR CHANGING WATER O	CHAR	ACTERISTIC
□ NUTRIENTS       □ ORGANIC CHEMICALS       □ OXYGEN DEFICIENCY         □ RADIONUCLEIDES       □ PETROLEUM (OIL & GREASE)       □ PESTICIDES, HERBICIC         □ TEMPERATURE       □ SEDIMENTATION/SILTING       □ MIXED CHEMICALS         □ CYANIDES AND PHENOLS       □ INORGANIC CHEMICALS (METALS)       ☑ OTHER (specify): Poss system with city water and/or	lble chlor	UNKNOWN  Tine poisoning from flushing
EXTENT OF AREA AFFECTED ESTIMATED OR ACTUAL SPECIES	S OF FISH	i Killed (if known)
MILES OF STREAM  ACRES OF LAKE  ACRES OF LAKE  AGG  Lake chubsu	cker, V	Varmouth, Spotted
SEVERITY  VALUE OF FISH KILLED  pickerel, Cha sunfish, Gold 81uegill sunfi Gambusia, Li	in pick Ifish, U sh, Blu ned to	erel, Redbreast inidentified sunfish, lespotted sunfish, pminnow, Swamp rside, Flat bullhead
ADDITIONAL REMARKS (Include effects on other than fish; e.g., shellfish, waterfowl, etc.)  The spill killed other aquatic organisms besides fishes including: 17 Cr	ayfish	. 16 Tadpoles.
INVESTIGATOR INVESTIGATOR MAILING ADDRESS AND PHONE NUMBER		DATE OF REPORT
Chad Sexton Jason Mitchell  P.O. Box 2089  Waycross, GA 31502  (912)285-6094	70. 70. 00 00 00 00 00 00 00 00 00 00 00 00 0	2/26/2013
EPD FOLLOW-UP INVESTIGATION REFERRED TO: ACTIONS TAKEN (if known) (EPD)		WQMU (EPD)

Figure 1. Map of study area for the fish kill investigation on Knights Creek in Valdosta, Lowndes County, GA on February 20-22, 2013.



	Legend	
Spill Origin	30°52'58.91"N	83°15'29.50"W
Site # 1 (Pump Station)	30°52'46.42"N	83°15'22.86"W
Site #2 (Jaycee Shack)	30°52'33.77"N	83°15'8.27"W
Site #3 (Park Avenue)	30°51'40,78"N	83°15'16.42"W

Figure 2. Photo of manhole that was the spill origin (photo taken on February 22, 2013).

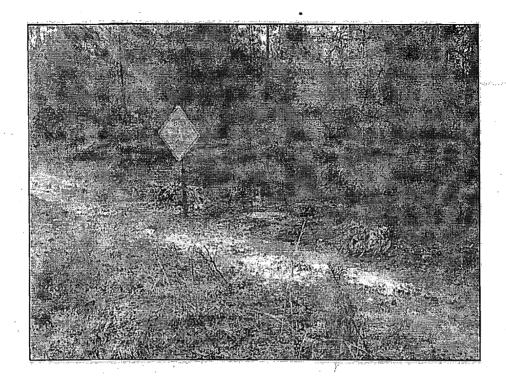


Figure 3. First road culvert holding water near spill origin (taken on February 22, 2013).

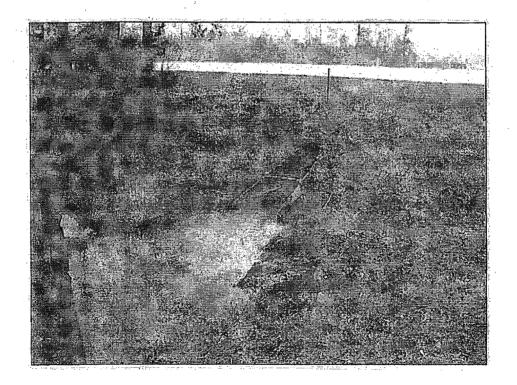


Table 1. Water quality measurements made during the fish kill investigation on Knights Creek in Lowndes County February 22, 2013 including GPS coordinates.

Station name or location	Time (hrs)	Water depth (ft)	Water Temp (°C)	D.O. (ppm)	pН	Total hardness (ppm)	Total alkalinity (ppm)	Specific conductance (µs)	Dead fish	GPS coordinates
Site # 1 (Pump Station)	1350	Surface	18.5	5.6	6.2	154	68	306	Yes	30°52'46.42"N 83°15'22.86"W
Site #2 (Jaycee Shack) Road	1430	Surface	16.4	6.1	6,1	68	34	252	Yes	30°52'33.77''N 83°15'8.27"W
Site # 3 (Park Avenue)	1536	Surface	15.4	7.01	6.1	68	68	91	No	30°51'40.78"N 83°15'16.42"W

Table 2. Number and monetary value of dead fish from the fish kill investigation in Knights Creek, Lowndes County, on February 20 - 22, 2013.

Species	Number of dead fish b	Value (\$) a/b		
Lake chubsucker		tits at a seek a section of the sect		
Erimyzon sucetta	26	21.85		
Flat bullhead	33	25.00		
Ameiurus platycephalus	33			
Western mosquitofish	8	1.04		
Gambusia affinis <sup>.</sup>	Ü	1.0.7		
Redbreast sunfish	225	75.75		
Lepomis auritus	220	, 5.75		
Warmouth	40	16.23		
Lepomis gulosus	10	1. V 14m4		
Bluegill	10	3.15		
Lepomis macrochirus	,	0.12		
Spotted sunfish	68	21.36		
Lepomis punctatus	P			
Largemouth bass	15	24.58		
Micropterus salmoides				
Redfin pickerel	10	15.97		
Esox americanus				
Chain pickerel	3	4.29		
Esox niger Goldfish				
	· <b>5</b>	2.05		
Carrassius auratus auratus		ı		
Bluespotted sunfish	3	0.81		
Enneacanthus gloriosus	J	0.01		
Lined topminnow	5	0.54		
Fundulus lineolatus	<i>.</i> •	VIJT.		
Swamp darter	10	4.22		
Etheostoma fusiforme	19	) v Int Cal		
Brook silverside	3	0.75		
Labidesthes sicculus	Ÿ	V., 5		
Unidentified sunfish	. 8	2.00		
Total	469	\$219.59		

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

b Expanded value = number counted multiplied by an expansion factor.

The expansion factor = total number of segments/number of segments sampled = 5/2 = 2.5

Table 3. Costs for the fish kill investigation on the Knights Creek in Lowndes County from February 20-22, 2013.

Item	Amount	· Commentation of	Cost (\$)		
Personnel a					
Fisheries Biologist I	8 hours		\$233.53		
Fisheries Technician III	12 hours		\$314.04		
Fisheries Technician II	8.5 hours		\$194.57		
Regional Supervisor	1 hour	/	.\$38.22		
Vehicles			•		
129823	130 miles		\$65.00		
Total			\$845.36		

<sup>&</sup>lt;sup>a</sup> Values include fringe benefits.

### GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

ATTACHMENT 4
City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 1, 2008 to July 31, 2013

# City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

WATERWAY IMPACTED	OVERELOW LOCATION	QUANTITY	REPORTED CAUSE
WAVELUNARIMETED	OVERTICAL ESCATION:	QUAIVIIII	ne, orred 6403E
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,473,000	HYDRAULIC OVERLOAD, CAUSED BY RAIN
			HEAVY RAIN, INFLOW AND INFILTARION (I/I) DURING WEEK
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,700,000	OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
٠	in an analysis of the second s	1	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE		5" on 2/21 and 2" on 2/22
		4 (	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE		5" on 2/21 and 2" on 2/22
MAITHI ACOOCHEE DIVER	2252 WETHERINGTON LANE	1	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
WITHLACOUCHEE RIVER	3352 WEI HERINGTON LANE		5" on 2/21 and 2" on 2/22 HEAVY RAIN CAUSED HIGH PEAK FLOW LEADING TO
WITHI ACOOCHEE RIVER	3352 WETHERINGTON LANE		HYDRAULIC OVERLOAD OF SECONDARY CLARIFIERS
THE TRANSPORTED HAVE	3332 WETTERMOTON LAW	10,000,000	THOMAGUE OVERLOAD OF SECONDARY CEARNIFERS
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10.200.000	HYDRAULIC OVERLOAD
	***************************************		
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16,900,000	HYDRAULIC OVERLOAD
MUD CREEK	1638 NEW STATENVILLE ROAD	6 300 000	HYDRAULIC OVERLOAD FROM TROPICAL STORM FAY
		3,333,333	
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,500,000	I&I, HEAVY RAINFALL
MUD CREEK	1638 NEW STATENVILLE ROAD	2,700,000	CLOGGED ACTIVATED SLUDGE TUBES
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8.800.000	HIGH SOLIDS IN EFFLUENT FLOW AND EXCESSIVE RAIN
	en de la companya de		
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	18,300,000	EXCESSIVE RAIN
NAUTHUACOOCHEE DIVED	22F2 M/FTUEDINGTON LAND		TI OODING
WITHLACOUCHEE RIVER	3352 WETHERINGTON LANE	24,800,000	FLUUDING
WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,400,000	I&I, HEAVY RAIN
WITH ACOOCHEE DIVED	2252 WETHEDINGTON LAND	14 000 000	INFLOW FROM HEAVY RAIN
	WITHLACOOCHEE RIVER MUD CREEK WITHLACOOCHEE RIVER MUD CREEK WITHLACOOCHEE RIVER MUD CREEK WITHLACOOCHEE RIVER WITHLACOOCHEE RIVER WITHLACOOCHEE RIVER WITHLACOOCHEE RIVER WITHLACOOCHEE RIVER	WITHLACOOCHEE RIVER  3352 WETHERINGTON LANE  WITHLACOOCHEE RIVER  3352 WETHERINGTON LANE  WITHLACOOCHEE RIVER  3352 WETHERINGTON LANE  WITHLACOOCHEE RIVER  3352 WETHERINGTON LANE	WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         6,473,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         7,700,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         15,500,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         16,400,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         10,600,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         10,200,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         16,900,000           MUD CREEK         1638 NEW STATENVILLE ROAD         6,500,000           MUD CREEK         1638 NEW STATENVILLE ROAD         2,700,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         8,800,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         18,300,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         24,800,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         24,800,000           WITHLACOOCHEE RIVER         3352 WETHERINGTON LANE         15,400,000

# City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,000,000	INFLOW FROM HEAVY RAIN
2010-03-11	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,200,000	INFLOW FROM HEAVY RAIN
2010-04-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	5,900,000	BIOLOGICAL UPSET OF SECONDARY TREATMENT SYSTEM
2011-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,100,000	RAIN INDUCED, HYDRAULIC PROBLEM AT PLANT
2011-02-10	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,300,000	HYDRAULIC OVERLOAD
2011-02-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,825,000	MECHÄNICAL FAILURE
2012-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,380,000	HYDRAULIC OVERLOAD OF WPCP SECONDARY SYSTEM
2013-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,047,000	HYDRAULIC OVERLOAD
2013-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	11,673,000	HYDRAULIC OVERLOAD
2013-02-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,173,000	EXCESSIVE RAIN
2013-07-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,600,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-24	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,950,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,500,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,000,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-30	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,200,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### ATTACHMENT 5a

EPA Comments on the City of Valdosta's Sewer Overflow Response and Reporting Procedures
April 11, 2013

EPA Comments on Sewer Overflow Response and Reporting Procedures: City of Valdosta – Response to 10/23/2012 Section 308 Request (Attachments E and F)

### Standard Operating Procedure (Attachment E)

- 1. Section II.A.1. If the crew confirms an overflow is occurring, then the start time recorded should be the initial time reported, or earlier if there is credible testimony, and not the time that the overflow was discovered by the crew. This should also be reflected in the process diagram.
- 2. Section II.A.5. Additional instruction concerning the perspective(s) and settings for the photographs is likely needed to ensure photos are taken that are of use in making estimations.
- 3. Section II.A.6. Additional instruction concerning procedure for measurements is likely needed to ensure measurements are obtained accurately.
- 4. Section II.A.9. Identification of the name of the waters is also necessary for reporting purposes.
- 5. Section II.B.2. Additional instruction concerning how to document causal observations is likely needed to ensure the information collected has consistent specificity.
- 6. Section III.D. Washing down the area after application of the disinfectant could still result in pollutants to the storm drain. Quarantining and collecting the wash water, or instructing that no wash water is to be directed or drained to the storm drain may be a prudent addition.
- 7. Section IV. Direction regarding how to respond and communicate back-ups to basements or homes due to the sewer overflow conditions is needed.
- 8. Section IV. Direction regarding how to record and communicate sewer overflows that do not reach waters of the state is needed.
- 9. Process diagram. Start time of overflow should be specified as noted above. More than one picture may be taken.

### Methods of Estimation

The sections is supply to

The two page document (Attachment F) offers insufficient instruction for performing the estimations of discharge. Valdosta needs to formalize its techniques and attach instruction to the standard operating procedure.

## GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# **ATTACHMENT 5b**

The City of Valdosta's Revised Sewer Overflow Response and Reporting Procedures
September 11, 2013

# Standard Operating Procedure Sanitary Sewer Overflow Response and Reporting

The purpose of this document is to establish a standard procedure for responding to and reporting sanitary sewer overflows from the City of Valdosta collection system. All sanitary sewer overflows require immediate response to stop the overflow and secure the affected area to protect public health. All overflows must be investigated to determine the cause and any contributing factors. Finally, all overflows must be documented to fulfill regulatory requirements and to provide information for future collection system improvements and repairs. Any sanitary overflow that allows untreated wastewater to enter waters of the state must be reported to the Environmental Protection Division (EPD), to the local media, and to the health department as required under the Georgia Rules for Water Quality Control section 391-3-6-.05 Emergency Actions.

#### I. Definitions:

### "Major Spill" means:

- 1. The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit for biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids.
- 2. Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water quality violations in the waters of the State.

"Spill" means any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to waters of the state.

"Waters of the State" means any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation. (O.C.G.A. 12-5-22)

### II. Identification of sanitary sewer overflow:

A. When a report of an overflow is received a utilities department crew must be dispatched to confirm that an overflow does exist. If the report is received after normal working hours the standby crew must respond. Upon locating and confirming the overflow the responders must follow procedures to document the overflow and aid in determining the extent of the overflow. Supervisors responding to the overflow will be able to help collect information and will make sure that all needed information is gathered.

- 1. Record the date and time the overflow began. This will be the time the initial report was received, or earlier if there is credible testimony to support the earlier time.
- 2. Report the overflow to the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager.
- 3. Advise the Collections Supervisor or standby supervisor of conditions and what equipment may be needed to stop the overflow
- 4. Check downstream manholes to determine if there is a blockage and to identify the approximate position of any blockage.
- 5. Document the overflow with pictures before removing the manhole cover, these pictures will be used to help estimate the rate of flow. When taking pictures of the overflow:
  - a. Use a digital camera on automatic settings
  - b. The camera must be set to the correct date and time, the date stamp option must be on so that the date will appear on the picture
  - c. Take at least one picture from the side of the manhole with a ruler in place to display the height of the sewage coming from the vents or around the manhole frame. If there are multiple vents discharging then more than one picture should be taken measuring the height of flow at different locations along the arc of the manhole cover.
  - d. Take one picture from above the manhole lid to document the number of vents releasing sewage or the percentage of the frame involved in the overflow.
  - e. Takes pictures of the sewage stream leaving the manhole, any ponds or pools of sewage for documentation. The size of these pools will be measured to estimate the volume in the pool.
- 6. Document information necessary to help determine the volume of the overflow. Since the conditions at each overflow will be different, there is no single method of determining total volume of sewage discharged that will be appropriate for all events. One or more of the following methods will be used. Appendix I contains detailed instructions for determining total volume.
  - i. For overflows from a manhole with the lid still in place, measure the depth of the spout of water at the rim or at the pick holes. Make a note of the depth measurement and where it was taken. Using a clock face record the areas overflowing and the measured height of the water at each five minutes of circumference. (Example: height of 1 inch from 1:00 to 2:00, height of ½ inch from 2:00 to 3:00, etc.
  - ii. For contained overflows map the containment area and measure the wetted area, including depth measurements.
  - iii. For runoff in a defined channel such as against a curb measure the width of the channel, the average depth, and the velocity of flow.
- 7. Follow the sewage stream to determine if the sewage is reaching waters of the state or entering the storm sewer system
- 8. Document any place sewage is entering waters of the state or the storm sewer system with pictures

- 9. Make a note of the point that the sewage is entering waters of the state or the storm sewer system as closely as possible using temporary markers or by noting landmarks. The name of the waterway receiving the discharge must be recorded for proper reporting.
- 10. Inform the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager of any entry into state waters.

### B. When the overflow has been stopped:

- 1. The responders must document the time that the overflow stopped. This information is required for reporting to the state. In addition, the rate of the overflow in gallons per minute and the duration of the overflow in minutes may be used to estimate the total volume released in gallons.
- 2. The responding crews will make on site observations to help determine the cause of the release. The crew should write on the work order form any physical indicators found such as rags, grease, broken pipe, dirt, bricks, etc. If any pictures can be taken of debris removed from the manhole or line, then these pictures will be helpful in determining the cause of the overflow. All such pictures should be taken using a digital camera in automatic mode with the date stamp turned on. A yardstick or ruler should be laid next to the debris to provide a size reference.

### III. Site Cleanup

- A. Collect as much of the sewage as possible using the vacuum truck
- B. Gather and remove sewage related debris and organic solids from the area.
- C. Using a solution of household chlorine bleach, such as Clorox or Purex, spray the affected area. Let the disinfectant remain in place for at least one-half hour. Recommended dosage of chlorine bleach is ¾ cup of liquid bleach to 50 gallons of water or 1 tablespoon of liquid bleach to five gallons of water.
- D. Wash down the area. Wash water applied after disinfection could still carry pollutants to the storm sewer system or a stream, therefore wash water must be directed away from any storm system inlet. Pools of wash water should be recovered using the vacuum truck.

### IV. Reporting of overflows, spills, and major spills:

A. All overflows should be reported to the Environmental Manager so that a record can be kept of the location, amount, and cause of the overflow. Overflows that do not reach waters of the state will be on record with the Utilities Department. Any customers whose property is affected by the overflow should be told of the event and of all cleanup actions that have been done or are planned.

- B. If sewage does reach the waters of the state then reporting to the EPD is required, along with public notification. The required actions are listed in the Georgia Rules for Water Quality Control; section 391-3-6-.05 Emergency Actions.
  - 1. In the event of a spill: (less than 10,000 gallons released to waters of the state and no water quality violation)
    - a. The City must notify the EPD immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
    - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.
    - e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.

- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- 2. In the event of a "major spill" (over 10,000 gallons released or a water quality violation occurs) the same responses are required with some extra requirements:
  - a. The City must notify the EDP immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
    - 1. Date of the spill:
    - 2. Location and cause of spill;
    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
    - 1. Date of the spill;
    - 2. Location and cause of spill;
    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
  - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.

- e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.
- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- g. The City must publish a notice of the major spill in the Valdosta Daily Times within seven days. The notice must include the items required in the initial report to EPD. Normally the Public Information Officer will arrange the public notice using a copy of the press release.
- h. The City must immediately begin a sampling program for the waterway affected by the major spill. Sample sites are selected upstream and downstream of the major spill site and are monitored for dissolved oxygen, temperature, pH, and fecal coliform. The Environmental Manager's staff will be responsible for selecting sites, collecting samples, and performing on site tests.
- C. Responding to backups to homes resulting from sanitary sewer overflows
- D. Recording of overflows that do not reach waters of the state
  - The Environmental Manager will maintain records of all sanitary sewer overflows whether or not there is discharge to the waters of the state. Therefore, all overflows must be reported to the Environmental Manager. In the event that the position of Environmental Manager is eliminated from the department organizational structure, the maintenance of overflow records will be reassigned by the Utilities Director, and the Standard Operating Procedure updated to reflect this change.
  - 2. The following information will be recorded for overflows that do not reach waters of the state:
    - a. Date and time the overflow began
    - b. Date and time the overflow ended
    - c. Location of the overflow
      - i. By address if one exists for the location
      - ii. By Latitude and Longitude if no address exists
      - iii. By manhole identification number if a manhole is involved
      - iv. By upstream and downstream manhole identification numbers is a pipe break is involved

- d. Cause of the overflow
- e. Volume discharged
- f. Volume recovered
- g. Final disposal of recovered sewage
- h. Description of cleanup

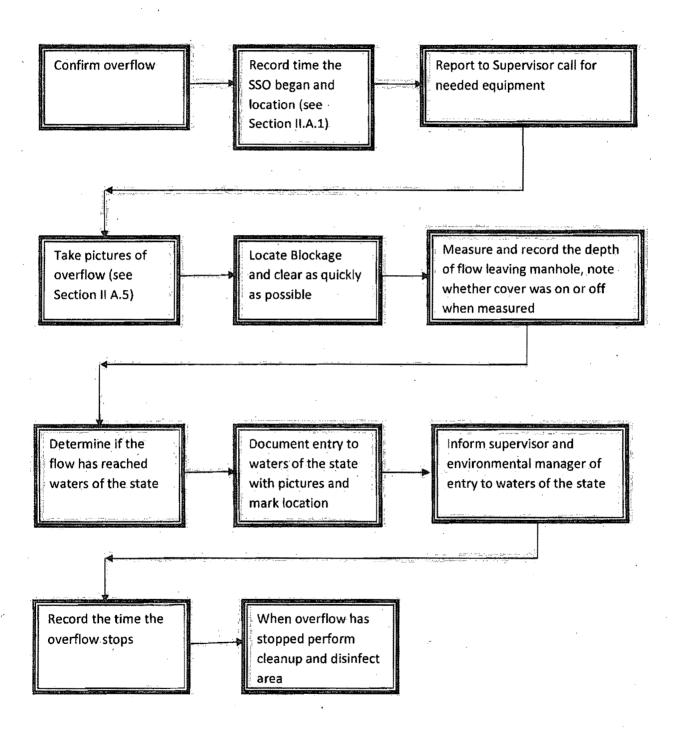
### E. Responding to backups that enter homes

- 1. The following information will be recorded for overflows that enter houses
  - a. Date and time of the backup
  - b. Address of the house
  - c. Name of the resident and owner
  - d. Cause of the overflow
  - e. Volume discharged
  - f. Volume recovered
  - g. Final disposal of recovered sewage
  - h. Description of cleanup
- 2. The collection system supervisor or crew leader will contact the Utilities Office Coordinator to report a backup into a residence
- 3. The Utilities Office Coordinator will arrange for professional cleaning services for the residence
- 4. The resident or home owner will be provided information on procedures for filing a claim

# City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date:	
Type of Occurrence:	
Date of Spill:	
Time Started or identified:	
Time Stopped:	•
Location:	and the second s
Amount:	
Did spill reach "Waters of the State"?	
Receiving water:	The state of the s
Cause:	
Corrective Action:	
<u> </u>	
ingeneral engeligen inger greek op eging skaarbyning og bill allen en skaarbyning op een	
Upstream sampling site will be:	
Downstream sampling site will be:	
Reported by:	· ·
Contact number:	

# Sanitary Sewer Overflow Response Process



# **Spill Documentation and Spill Volume Calculation Guidance**

# **D.1 Spill Documentation**

Upon initial discovery of a spill, utility personnel should document and record the following information:

- Date;
- Time (based on best professional judgment, estimate the start time of the overflow prior to initial discovery or establish the start of the spill at the time of receipt of a customer service request reporting of a spill);
- Description of spill.
- Where it started;
- Where the spill discharged to (describe the nearest receiving water body and conduct a visual inspection for signs of algae, rags, raw sewage, and debris; also inspect and describe immediate upstream and downstream areas);
- Determine time period of long term spill events (evidence such as algae growth indicates a long term spill and it is estimated that algae growth occurs after one month of exposure to sewage); and
- Estimate volume since discovery of the spill.
- Use photographs to document all information possible.

# D.2 Spill Volume Calculation

The following sections provide guidance for estimating spill flow volume for manholes, broken pipes, wet weather, and pump station outage. This is provided as guidance only however, if a different method is used to calculate spill volume, that method should be validated and described.

#### D.2.1 Broken Lines

Table D-1 provides Spill Volume Calculation by Flow Rate for different size pipes.

VERSION 4/18/2006 D-2

### SANITARY SEWER FLOW RATES FOR SPILL DETERMINATIONS

Depth of Flow (inches)	Pipe Size								
	6	8	10	12	15	18	21	24	30
1	15	20	25	30	35	40	45	50	100
2.	50	60	70	80	85	95	105	125	145
3	90	110	125	135	150	175	185	210	230
4	125	160	180	200	235	260	285	320	350
5	155	190	240	280	315	360	380	445	470
6	180	260	310	355	415	455	500	555	630
7		290	370	425	495	570	620	895	770
8	Shah de adrille d	320	430	500	600	680	760	815	1010
9 =			465	575	690	800	890	965	1260
10			490	625	775	905	1005	1120	1360
11	1			685	870	1020	1135	1275	1490
12		The state of the s		715	935	1130	1260	1410	1630
13				2.40° 000	1020	1240	1415	1580	1870
14					1070	1345	1520	1690	2110
15			. :: .: .:		1105	1425	1650	1850	2220
16	74					1495	1760	1990	2560
17				· · · · · · · · · · · · · · · · · · ·	2 (1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1	1550	1880	2110	2730
18	V.					1595	1980	2285	2940
19	galasia waa oo saa a						2050	2410	3100
20		1			7		2115	2530	3330
21						in summer	2160	2630	3510
22		on production to the state of t	2 mm 2				1	2700	3780
23	<u> </u>			<del> </del>				2765	3900
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Gallons per Minute @ V=2.0 feet per second (ft/sec) and n=0.013; Adjust accordingly for flat or steep sloped sewers.

VERSION 4/18/2006 D-3

#### SPILL CALCULATION PROCEDURES

- 1. Determine and record the time of initial caller notification of sewer spill.
- 2. Measure and record the flow in inches immediately downstream of spill or blockage and determine flow rate in gallons per minute (gpm) using table above. Record the pipe size in inches.
- Clear obstacles from blocked sewer, allow free and steady flow to stabilize. Notetime the flow stabilizes.
- Measure the depth of flow in inches in the previously blocked sewer and determine flow rate from table above.
- 5. Subtract the flow rate from the downstream sewer determined in 2 above from the flow rate from the previously blocked sewer determined in 4 above and multiply the result by the elapsed minutes from notification to clearance.
- 6. Report total amount spilled to Supervisor or Superintendent

#### SEWER OVERFLOW AND SPILL PROCEDURES

- 1. 99% of all visible debris should be removed from the site.
- Areas where sludge is pooled should be pumped back into sewer.
- 3. Site should be raked and limed to neutralize sludge accumulations.
- Deodorant should be applied to neutralize odor problems.
- Areas below where spill entered stream should be checked for visible debris or sludge on banks.
- 6. Crew Chief should document on Work Order extent of cleanup completed and note whether repeat visits for additional lime applications are needed.
- Crew Chief should insure that Supervisor or Superintendent has notified the GA
   EPD (during normal duty hours) or that Dispatch has notified GA EPD (during offduty hours). Telephone notification is required with backup letter report.
- 8. If spill has occurred at a national park, National Park Service also should be notified using same procedures as noted above.
- Supervisor or Superintendent should insure that spill location is entered into the GIS database.
- Superintendent and Division Manager should identify repeat locations and develop plan to eliminate further spills at these locations.

## D.2.2 MANHOLE OVERFLOWS (Adapted from Guidance from GA EPD)

The following guidance can used in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used. The following manhole SSO quantification methods are provided as guidance.

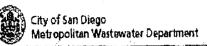
VERSION 4/18/2006 D4

# D.2.2.A Estimating Spill Flow rates for overflowing manholes

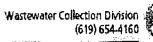
VERSION 4/18/2006

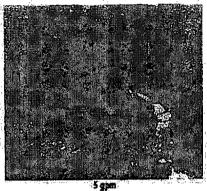
This is a visual estimating method. Please refer to Exhibit D-2 for the Reference Sheet. Source: City of San Diego Metropolitan Wastewater Department.

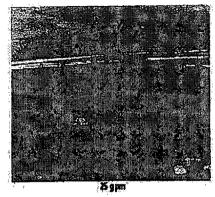
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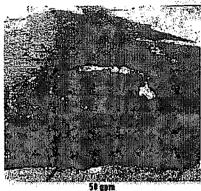


**Reference Sheet for Estimating Sewer Spills** from Overflowing Sewer Manholes
All estimates are calculated in gallons per minute (gpm)

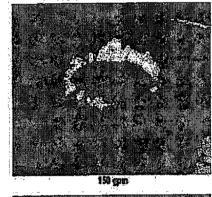


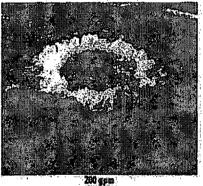


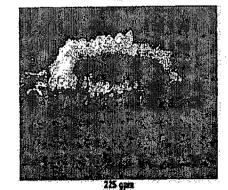


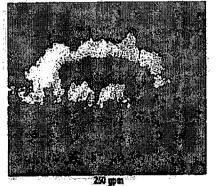


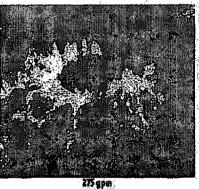












All photos were taken cluring a demonstration using metered water from a hydrani in cooperation with the City of San Diego's Water Department.

rex 4/99

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#### D.2.2.B Volume of SSO at Manhole

Length x Width x Depth x 7.48 = gallonsSpill area = 20 feet by 30 feet = 600 sq. ft. Depths of spill = 3 inches = 0.25 feet Volume =  $20 \times 30 \times 0.25 \times 7.48 = 1,122 \text{ gallons}$ 

#### **D.2.3 WET WEATHER OVERFLOW CALCULATION:**

The following can be used to help in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used.

All calculations are based on an estimate of the size of the opening involved, the velocity of flow through the opening, and the duration of time the overflow occurred. In most all occurrences, the opening size and velocity will change over an event from low to high back to low. Judgment on an average condition must thus be attempted to reach a realistic rate of loss.

#### D.2.3.A. Loss through vent holes

1. Size of opening:

Assume holes at 1- inch diameter

Area = (number of holes) ( $\pi$ ) (D<sup>2</sup>/4) (1ft<sup>2</sup>/144) Area = (number of holes) (3.14) (1/4) (1/144)

Area =  $(number of holes) (0.0055ft^2/hole)$ 

#### 2. Velocity Plume Guide

Velocity through holes, based on Velocity Head = (Velocity<sup>2</sup>/2g)

Plume height	Velocity
1-inch	2.0 ft/sec
2-inch	3.3 ft/sec
3-inch	4.0 ft/sec
4-inch	4.6 ft/sec
5-inch	5.2 ft/sec
6-inch	5.7 ft/sec

#### 3. Time = convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example: Top with six hole, flow through holes makes a one-inch high plume,

last for 4 hours, 15 minutes

Volume =  $(6 \text{ holes } \times 0.0055 \text{ ft}^2/\text{hole}) (2ft/\text{sec}) (255 \text{ min}) (448 \text{ gpm/cfs})$ Volume = (0.033) (2) (255) (448) = 7540 gallons

#### D.2.3.B. Loss around edge of non-vented cover:

#### 1. Size of opening:

As the weight of manhole lid will generally hold it in place until internal pressures exceed 0.4 pounds/sq. in., loss occurs through imperfections, grit, etc. between the lid and manhole frame. Observations are generally a vertical ring of water from side gap between the lid and frame of approximately ¼ inch width:

Area = 
$$(\pi)$$
 (D) (½ inch) (1/12 in/ft)  
= (3.14) (2ft) (1/4) (1/12)

Area = 
$$0.131 \text{ ft}^2$$

#### 2. Velocity through gap

(see vertical plume guide above, D.3.A.2.)

#### 3. Time - convert to minutes

Example: Manhole with 4-inch plume around edge for 2 hours, 15 minutes

#### D.2.3.C. Loss from tilted cover

#### Size of opening:

Some estimate has to be made in the field concerning how much gap exists in order to do this calculation. For the following amounts of lift of one side, the areas are as follows:

A = 
$$(\pi)$$
 (D) (in of lift)  $(1/12 \text{ ft/in})$   $(1/2)$   
A =  $(3.14)$  (2ft) (in. of lift)  $(1/12)$   $(1/2)$   
A =  $0.262$  (in. of lift)

	Lift (inches)	ing to the second	Area (ft²)	4
:	1			
	2		0.524	
All sobjects	3		0.786	
	4		1.048	

#### 2. Velocity through opening

This must be estimated from visual observation. A low rate would be 2/ft/sec, moderate rate at 4 to 5 ft/sec, high rates up to 7 ft/sec. Over 7 ft/sec, the lid will

VERSION 4/18/2006 D-8

probably blow off the manhole. The gap (lift) will generally increase with higher velocity as well.

#### 3. Time – convert to minutes

Example:

Field observation of 2-inch gap and velocity of 4 ft/sec for a period of 3 hours, 30 minutes.

Volume (Gal.) = 
$$(0.524 \text{ ft}^2)$$
 (4ft/sec) (210min) (448)  
= 197,192 gallons

#### D.2.3.D. Loss from Manhole without a lid in place

If no cover exists, an estimate of the average height the water column (plume) extends above the top of the manhole frame must be made. Use the height to velocity estimate from (A) above to estimate the velocity. Be sure to adjust the height estimate downward for the affects of debris around the edge of the rim which will cause the height to be incorrectly high.

Area = 
$$(\pi)$$
  $(D^2/4)$  =  $(3.14)$   $(2^2/4)$  =  $3.14$  ft<sup>2</sup>

Velocity - from field observation of water column height

Time - convert to minutes

Example: inch

A manhole without a lid was observed to have an overflow with a 3 – high column of water for a period of 6 hours, 10 minutes

Volume (Gal.) = 
$$(3.14)$$
 (4.0 ft /sec) (370) (448)  
Volume =  $2,081,946$  gallons

#### D.2.3.E. Other

- 1. Generally approach of estimating a cross sectional area where the flow is leaving and a velocity of flow can be used to determine a rate. This can be applied to any situation.
- Several observations over an event to estimate the area and velocity are better than a single observation. The overflow examples above assume a constant rate over the period which will estimate volumes too high. As an example, if an hour at the beginning and end of each event is assumed for the flow to build up from zero to maximum and back to zero, a calculation could be done as follows:

VERSION 4/18/2006 D-9

#### Example:

A manhole with a cover tilted open 2 inched with an estimated velocity of 4 ft/sec at its worst rate of loss for two hours and about 1-inch tilt with a velocity of 2 ft/sec observed at two other occasion over a 7 hour total event.

Worst case: 2 hours, 2 inched tilt, 4 ft/sec Other times: 1 inch tilt, 2 ft/sec, time unknown

Total overflow time: 7 hours

#### Divide total of 7 hours into several periods

1st hour:

Start to 1-inch tilt, 2 ft/sec

Volume (Gal.) = (Area) (Velocity) (Time) (448) x 50% = (0.262) (2) (60) (448) (0.50) = 7,043 gallons

7th hour:

1-inch tilt, 2 ft/ sec down to end Same as above situation

Volume = 7.043 gallons

5 remaining hours:

2 hours at 2-inch tilt, 4 ft/sec 3 hours at 1-inch tilt, 2 ft. sec

Volume = (0.524) (4 ft/sec) (120 min) (448) = 112,681 gallons

Volume = (0.262) (2 ft/sec) (180 min) (448) = 42,255 gallons

Event Total = 7,043 + 7,043 + 112,681 + 42,255 = 169,022 gallons

## GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## **ATTACHMENT 6**

Corrective Action Plans and Schedules Revised September 11, 2013

# **Corrective Action Plans and Schedules**

Action Item No.	Action Description	Completion Date
1a. (Phase 1)	Pump Station, Force Main, Headworks and Equalization Basin Project: Design and construct two new master pump stations, two smaller pump stations, a new force main, and a new headworks structure with grit removal and bar screens at the location of the existing Withlacoochee WPCP. Complete construction of a 6.0 MG equalization basin, which will be included at this site for initial wet	July 2016
	weather flows and future flow equalization through the new treatment plant. The flow from this project will be gravity fed to the existing WPCP for final treatment and discharged utilizing the existing plant outfall. This project will replace an existing 54-inch gravity sewer main to the current plant as well as the existing influent pump station, both of which are highly prone to severe inflow and flooding from the Withlachoochee River.	
1b. (Phase 2)	Relocation of Withlacoochee WPCP to new location 60 feet above current flood level: Complete construction of the relocated Withlacoochee WPCP. Upon completion, the relocated Withlacoochee WPCP will continue to use the existing Withlacoochee WPCP outfall on the Withlacoochee River.	August 2017
2.	Collection System Evaluation Program: Complete a 5-year system wide plan to evaluate the entire sanitary sewer collection system (300 total miles of lines, with 75 miles already evaluated) and develop a schedule for repairs. The evaluation will include the inspection of all manholes and collection system lines using smoke testing first to be followed by Closed Circuit Television (CCTV) Inspections of high priority areas. The evaluation will be utilized to prioritize and perform critical repairs and to plan and prioritize major rehabilitation projects for the future. A schedule to complete major rehabilitation projects identified during the evaluation will be submitted for EPD approval by December 2018.	December 2018
3.	Manhole Replacement/Rehabilitation Program: Continue implementing the existing program and complete the inspection of approximately 3,390 remaining manholes (2,610 inspected to date). Prioritize replacement or rehabilitation of the most deteriorated manholes. Complete the replacement or rehabilitation of a minimum of 60 manholes each year until all Priority 1 manholes are completed. A schedule will be submitted to EPD for ongoing rehabilitation to address Priority 2, and all remaining manholes, on an annual basis.	December 2018
4a.	Lift Station Rehabilitation/Replacement Program: Continue implementing existing rehabilitation/replacement program until all existing older lift stations are rehabilitated or replaced. This will include connection to SCADA and/or auto-dialer systems, along with emergency power capabilities for connection to portable generators.	December 2018

4b.	Purchase Portable Generators for lift stations: The purchase of three portable generators will be completed (one per year, with the first generator purchased by December 2014) so that any existing lift stations not wired with two independent electric feeds can be connected to a portable generator for emergency power needs. In addition to the generators, the City will work with Godwin Pumps to meet emergency bypass pumping needs at each lift station whenever needed.	December 2016
5.	Ongoing Repairs to the Existing Withlacoochee WPCP: Ongoing repairs to the existing Withlacoochee WPCP will be conducted to maintain permit compliance until such time as the new treatment plant is brought online. Present repairs include new bar screens and temporary blower system.	August 2017

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# ATTACHMENT 7

Sanitary Sewer Projects Completed By the City From 2009 to Present April 9, 2013

No.	Project	. 22	Cost
1	CMMS for the Utility Department	\$	85,00
2	Mud Creek Emergency Manhole Repair	\$	103,00
3	Withlacoochee Biosolids Converyor Repair (FEMA)	\$	52,00
4	Withlacoochee Multi-Media Filters Repair (FEMA)	\$	46,00
5	Replacement of SO2 and CL2 systems (FEMA)	\$	82,700.0
6	Replacement of Reuse system controls (FEMA)	\$	*13,377.
7	Eectronics dryout and replacement of pannels, transformers, and misc components (FEMA)	\$	169,277.
8	30% Design for Force Main, EQ Basin and Lift Stations	Š.	100,0
9	CCVT Evaluation of Mud Creek and Knights Creek Trunk Lines	\$	122,0
10	Cleaning of Withlacoochee Influent Pump Station Wet Well	\$.	373,0
11	Rehabilitation of Four Problematic Lift Stations	\$ \$	1,500,0
12	Withlacoochee Nitrification Pump Replacement	\$	60,0
13	Withlacoochee Influent Pump Station Impeller Replacement	\$ \$	90,0
14	Withlacoochee RAS Controller Replacement	\$	36,0
15	Thickener pump replacement	\$ \$	53,068.
16 ·	Valve actuators for liftstation	ъ \$	8,369.
17		\$	3 <b>8,</b> 110.
18	RAS pump impellers	ъ Š	33,642.
19	4 - 5hp submersible pumps	. ⊅ Տ÷	33,042. 320,154.
20	Phase I Manhole Rehabilitation	. Ф. \$	20,154.
21	Country Club Emergency Manhole Repair	\$	72,0
22	Withlacoochee Roughing Tower Controller Replacement	\$.	38,0
23	Purchase of 75-acres for Relocation of Plant	ъ. \$	1,012,5
24	Water and Sewer Rate Analysis	\$ \$	50,0
25	Construction of Tucker Road Lift Station	\$	204,0
26	Withlacoochee Belt Press Major Repairs	\$	204,0 52,0
20 27	Phase 2 Manhole Rehabilitation	ърс. \$	237,0
27 28	Goodyear Lift Station Rehabilitation	ъ: \$	104,0
20 29	CCTV work for Big County Lift Station Service Area	Anna Carlo	De Lange of Landing and Arthur Street
29 30 ♣	100% Design for Force Main, EQ Basin and Lift Station	\$ \$	108,00 1,400,00
31	Withlacoochee Emergency Repairs for broken 20-inch Valve	ъ \$	616,0
462		Carried St.	
32	Withlacoochee Sludge Pump Replacement	<b>\$</b>	54,0
33	Blanchard Street Emergency Repairs	\$	234,0
34	Temporary Bar Screens at Withlachoochee	\$	104,7
35	Temporary Blower System at Withlachoochee	\$	376,1
36	Projected Easement costs for force main project	<b>S</b> :	370,00
37	Recent emergency repairs at Withlachooche follow Flood	\$	203,22
38	Repair to Tucker Road Outfall	\$	27,40
40	Mud Creek WPCP Expansion and Upgrades	\$	41,000,00
MASKETT -	Total:	\$	49,453,78

#### Ammons, Brad

From: Jim Lloyd <sriverjim@aol.com>

Sent: Wednesday, March 26, 2014 4:01 PM

**To:** Johnson, Alenda E.

**Cc:** "Ammons.Brad@epa.gov, elizabeth.porter <elizabeth.porter@myfloridahouse.gov>,

keith.perry < keith.perry@myfloridahouse.gov>, halsey.beshears

<halsey.beshears@myfloridahouse.gov>, dauphinee <dauphinee@bellsouth.net>,
millerroy5 < millerroy5@gmail.com>, henryhaggerty <henryhaggerty@hotmail.com>,

daelaine04 <daelaine04@gmail.com>, bobimc <bobimc@windstream.net>, annebrinker <annebrinker@hotmail.com>, weigel <weigel@windstream.net>,

janiceturner\_2 <janiceturner\_2@msn.com>, diakenhome

, < diakenhome"@windstream.net</p>

Subject: Re: Waste spill contamination in Withlacoochie & Suwannee Rivers

Alenda E. Johnson
Environmental Eng. & Conventional Workgroup Lead |
Municipal & Industrial Enf. Section |
U.S. Environmental Protection Agency

Ms. Johnson,

Thank you for your 3/19 response to our earlier email concerning waste spills from the Valdosta, GA treatment facility (Brad Ammons forwarded us your reply since our email address was inadvertently dropped from your distribution). It is good to learn that the Georgia Environmental Protection Division (GEPD) is involved with the situation at Valdosta and has taken a number of steps (as outlined in your email) to address the ongoing problems, We do have a few questions regarding the GEPD December 2013 Consent Order to the City of Valdosta:

- 1. Does the Order identify interim timetable checkpoints to measure/determine Valdosta's progress toward meeting complete relocation of the entire Wastewater Treatment Plant to an area above flood level by August 2017 and overhaul of their entire sanitary sewer collection system by December 2018?
- 2. Does the Order identify penalties for failure to meet timetables or other requirements of the Order?
- 3. Will your EPA Office monitor or be kept informed on progress toward fixing this situation?
- 4. Your email mentions that Valdosta is required to immediately implement a "Sewer Overflow Response Plan" that has been approved by the GEPD. Is there someplace we can obtain a copy of that plan?

As you are probably aware, Valdosta is in the news again with yesterday evening's TV reports of another sewage line failure dumping in excess of 250 gpm of raw sewage into the rivers, This means waste discharge of about half a million gallons a day until a 1000 foot / 21" diameter bypass line can be installed. The news commented on growing concern about negative economic impacts on river related recreation as result of the frequent pollution reports. The Madison County Chamber of Commerce is reported to have sent a strong letter of concern to Governor Scott asking for involvement of his office to raise attention on the issue - so far no word from the Governor. A Branford City Official has expressed the same concern to us and we're sure similar feelings of economic and as well as health concern rests with businesses and the public throughout the Suwannee River Valley.

Thanks for your continued help and focus on this issue,

Jim & Daphne Lloyd Branford, FL 32008

----Original Message-----

From: Ammons, Brad <Ammons.Brad@epa.gov>

To: sriveriim <sriveriim@aol.com>

Cc: Ammons, Brad <Ammons.Brad@epa.gov>; Johnson, Alenda E. <Johnson.Alenda@epa.gov>

Sent: Thu, Mar 20, 2014 3:00 pm

Subject: FW: Waste spill contamination in Withlacoochie & Suwannee Rivers

Mr. Lloyd:

Below is the email Alenda sent you.

#### **Brad Ammons**

Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section

From: Johnson, Alenda E.

Sent: Wednesday, March 19, 2014 5:33 PM

**To:** <u>elizabeth.porter@myfloridahouse.gov</u>; <u>keith.perry@myfloridahouse.gov</u>; <u>halsey.beshears@myfloridahouse.gov</u>; <u>dauphinee@bellsouth.net</u>; <u>millerroy5@gmail.com</u>; <u>henryhaggerty@hotmail.com</u>; <u>daelaine04@gmail.com</u>; bobimc@windstream.net; <u>annebrinker@hotmail.com</u>; <u>weigel@windstream.net</u>; <u>janiceturner</u> 2@msn.com

Cc: Diaz, Denisse; Horsey, Maurice; Ammons, Brad

Subject: RE: Waste spill contamination in Withlacoochie & Suwannee Rivers

Mr. and Mrs. Lloyd,

Thank you for your March 7, 2014 email to the EPA Clean Water Enforcement Branch Chief regarding the 7.5 Million gallon spill in Valdosta, GA. Since the Georgia Environmental Protection Division (EPD) is authorized to implement compliance and enforcement from point source discharges in the State of Georgia, EPD was contacted regarding your concern.

EPD issued a Consent Order to the City of Valdosta on December 4, 2013 to address the wastewater collection system issues that resulted in the spill. The Order requires the City to perform the following:

- A 5 year evaluation and point repairs of the entire sanitary sewer collection system (to be completed by December 2018)
- Relocation of the entire Withlacoochee WPCP to an area above flood level (to be completed by August 2017)
- Upgrades to the existing Withlacoochee WPCP to obtain compliance with current NPDES permit limits (to begin immediately and continue until relocation of the new Withlacoochee WPCP)

Additionally, the City of Valdosta is required to immediately implement a Sewer Overflow Response Plan that has been approved by EPD. I hope this addresses the concerns you raised. Should you have any further questions, please email me at this address or contact me using the information below.

Alenda E. Johnson | Environmental Eng. & Conventional Workgroup Lead | Municipal & Industrial Enf. Section | U.S. Environmental Protection Agency | 61 Forsyth Street, SW | Atlanta, GA 30303 | Voice: 404-562-9761 | Fax: 404-562-9772 | Email: Johnson.Alenda@epa.gov

#### Ammons, Brad

From:

Ammons, Brad

Sent:

Thursday, March 20, 2014 3:28 PM

To:

sriverjim@aol.com

Cc:

Johnson, Alenda E.; Ammons, Brad

Subject:

RE: Waste spill contamination in Withlacoochie & Suwannee Rivers

**Attachments:** 

Signed Executed Order 12-9-2013.pdf

Mr. Lloyd:

Pursuant to our call today, attached is the Order that GA EPD issued against Valdosta, GA. Below is the website where you can check the compliance status of Valdosta's Wastewater Treatment Plant. The NPDES permit numbers for Valdosta's 2 WWTPs are GA0033235 and GA0020222. I would use the **GA0033235** permit # to search for the **Withlacoochee River WWTP**.

#### http://echo.epa.gov/?redirect=otis

Click on "Explore Facilities" button and then type in one of the two permit #s above (under "Single Facility Search"). Once there, under "Facility Name" is a hyperlinked name of the WWTP (in this case, "Withlacoochee River WPCP/City of Valdosta"). Click on that hyperlink and it will take you to the facility info screen, where you can see where the facility is located, permit issuance/expiration dates; general compliance with the Permit; any enforcement issued (usually by the State), etc. Clicking on "Enforcement and Compliance", it does not appear that GA EPD has coded the attached Order into the database yet, as there are no listed "Formal Enforcement Actions" listed.

#### **Brad Ammons**

Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section
U.S. EPA Region 4
61 Forsyth St., SW
Atlanta, GA 30303
(404) 562-9769 (O)
(404) 562-9729 (F)
http://www.epa.gov/region4/water/wpeb/index.html

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From: Ammons, Brad

Sent: Thursday, March 20, 2014 3:01 PM

To: 'sriveriim@aol.com'

Cc: Ammons, Brad; Johnson, Alenda E.

Subject: FW: Waste spill contamination in Withlacoochie & Suwannee Rivers

Mr. Lloyd:

Below is the email Alenda sent you.

#### **Brad Ammons**

Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section
U.S. EPA Region 4
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From: Johnson, Alenda E.

Sent: Wednesday, March 19, 2014 5:33 PM

**To:** <u>elizabeth.porter@myfloridahouse.gov</u>; <u>keith.perry@myfloridahouse.gov</u>; <u>halsey.beshears@myfloridahouse.gov</u>; <u>dauphinee@bellsouth.net</u>; <u>millerroy5@gmail.com</u>; <u>henryhaggerty@hotmail.com</u>; <u>daelaine04@gmail.com</u>; <u>bobimc@windstream.net</u>; <u>annebrinker@hotmail.com</u>; <u>weigel@windstream.net</u>; <u>janiceturner 2@msn.com</u>

Cc: Diaz, Denisse; Horsey, Maurice; Ammons, Brad

Subject: RE: Waste spill contamination in Withlacoochie & Suwannee Rivers

Mr. and Mrs. Lloyd,

Thank you for your March 7, 2014 email to the EPA Clean Water Enforcement Branch Chief regarding the 7.5 Million gallon spill in Valdosta, GA. Since the Georgia Environmental Protection Division (EPD) is authorized to implement compliance and enforcement from point source discharges in the State of Georgia, EPD was contacted regarding your concern.

EPD issued a Consent Order to the City of Valdosta on December 4, 2013 to address the wastewater collection system issues that resulted in the spill. The Order requires the City to perform the following:

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Additionally, the City of Valdosta is required to immediately implement a Sewer Overflow Response Plan that has been approved by EPD. I hope this addresses the concerns you raised. Should you have any further questions, please email me at this address or contact me using the information below.

Alenda E. Johnson | Environmental Eng. & Conventional Workgroup Lead | Municipal & Industrial Enf. Section | U.S. Environmental Protection Agency | 61 Forsyth Street, SW | Atlanta, GA 30303 | Voice: 404-562-9761 | Fax: 404-562-9772 | Email: Johnson.Alenda@epa.gov

From: Jim Lloyd [mailto:sriverjim@aol.com]
Sent: Friday, March 07, 2014 11:29 AM

To: Diaz, Denisse

**Cc:** <u>elizabeth.porter@myfloridahouse.gov</u>; <u>keith.perry@myfloridahouse.gov</u>; <u>halsey.beshears@myfloridahouse.gov</u>; <u>dauphinee@bellsouth.net</u>; <u>millerroy5@gmail.com</u>; <u>henryhaggerty@hotmail.com</u>; <u>daelaine04@gmail.com</u>;

bobimc@windstream.net; annebrinker@hotmail.com; weigel@windstream.net; janiceturner 2@msn.com

Subject: Waste spill contamination in Withlacoochie & Suwannee Rivers

Denise Diaz Chief, Clean Water Enforcement Branch US EPA 61 Forsyth St. Atlanta, GA 30030

Dear Ms. Diaz

Last week local TV announced a warning to stay clear of fish from or contact with waters of Florida's Suwannee River due to a 7.5 million gallon breach of waste water by the Valdosta, GA waste water treatment plant. The waste flowed into Georgia's Withlacoochee then on to the Suwannee River. This is the 3rd or 4th reported incident from this facility in the past year - a very unusual number compared with very few reported incidents in the past. We don't recall a spill cause being identified for the recent alert; but, others have been attributed to heavy rain. However heavy rains are not unusual for the South Georgia / North Florida region - they have been occurring off & on for years and should be reflected in facility designs.

Something must be wrong now! Possibly a sudden failure or ongoing mismanagement of facility equipment or maybe past spills have simply gone unnoticed or unreported.

We and most of our neighbors are retired full time residents living along the Suwannee River. We, our children, our grandchildren and friends frequently fish from, swim in, boat on and generally enjoy the river. We are increasingly concerned about what is happening to the river. After seeing all the appropriate national media outcry and immense state & federal reaction to the recent West Virginia river contamination, we wonder why issues with the beautiful Suwannee River are not receiving similar national media and public attention.

Since the Valdosta problems are affecting waters of two states, this would seem to qualify as a Federal issue and therefore should rate heavy EPA investigation and involvement to assure needed follow-up including necessary temporary steps, permanent fixes and appropriate fines if merited.

Can your office help out on this one?

Thanks for your attention,

Jim & Daphne Lloyd Branford, Florida





#### Phillips, David

From:

Ammons, Brad

Sent:

Thursday, February 06, 2014 9:56 AM

To: Cc:

Horsey, Maurice Phillips, David

Subject:

FW: Copy of City of Valdosta Proposed Consent Order

Attachments:

Signed Executed Order (2).pdf

FYI, we'll count Valdosta as addressed now (that's 5 addressed this FY, Maurice)!

#### **Brad Ammons**

Environmental Engineer

Clean Water Enforcement Branch

Municipal & Industrial Enforcement Section

U.S. EPA Region 4

61 Forsyth St., SW

Atlanta, GA 30303

(404) 562-9769 (O)

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http://www.epa.gov/region4/water/wpeb/index.html

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From: Hembree, Kim [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Thursday, February 06, 2014 9:36 AM

To: Ammons, Brad

**Cc:** Shahbazaz, Marzieh; Hendricks, Jane; Horsey, Maurice **Subject:** RE: Copy of City of Valdosta Proposed Consent Order

From: Ammons, Brad [mailto:Ammons.Brad@epa.gov]

Sent: Thursday, February 06, 2014 9:11 AM

To: Hembree, Kim

Cc: Shahbazaz, Marzieh; Hendricks, Jane; Horsey, Maurice; Ammons, Brad

Subject: RE: Copy of City of Valdosta Proposed Consent Order

Kim:

Was the CO ever finalized? I couldn't find a copy, if it was. If so, please send us a copy.

Thanks,

#### **Brad Ammons**

Environmental Engineer

Clean Water Enforcement Branch

Municipal & Industrial Enforcement Section

U.S. EPA Region 4

61 Forsyth St., SW

Atlanta, GA 30303

(404) 562-9769 (O)

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http://www.epa.gov/region4/water/wpeb/index.html

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From: Hembree, Kim [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Tuesday, October 22, 2013 4:54 PM

To: Ammons, Brad

Cc: Shahbazaz, Marzieh; Hendricks, Jane

Subject: RE: Copy of City of Valdosta Proposed Consent Order

Mr. Ammons.

As EPD's website states, public comments regarding the proposed order should be sent to the following address:

Mr. James A. Capp, Chief, Watershed Protection Branch Environmental Protection Division 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

Please note that the public comment period for the proposed order ends October 25, 2013.

Thanks,

-Kim Hembree

From: Ammons, Brad [mailto:Ammons.Brad@epa.gov]

Sent: Tuesday, October 22, 2013 4:05 PM

To: Hembree, Kim

Cc: Shahbazaz, Marzieh; Hendricks, Jane

Subject: RE: Copy of City of Valdosta Proposed Consent Order

FYI, our Administrator received an email from someone who owns property along the Withlacoochee River (downstream) asking some very direct questions and claims to be an Attorney. I noted to her (in our response) that your proposed CO was online (for a few more days) for comment and put Kim's name/contact info down if this person wants to discuss the CO. Let me know if I should put someone else as a contact.......

Finally, we received a 60-day notice of intent to sue by an Attorney's office here in Atlanta representing several clients who appear to live along Meadowbrook Drive. Is there anything you all know that is relevant to this specific area of Valdosta?

#### **Brad Ammons**

Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section
U.S. EPA Region 4
61 Forsyth St., SW
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From: Hembree, Kim [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Monday, September 30, 2013 10:07 AM

To: Ammons, Brad

Cc: Shahbazaz, Marzieh; Hendricks, Jane

Subject: Copy of City of Valdosta Proposed Consent Order

Kim Hembree Environmental Specialist III Wastewater Regulatory Program Georgia Environmental Protection Division

Phone: 404.362.2605 Fax: 404.362.2691



# Georgia Department of Natural Resources

# **Environmental Protection Division**

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334 Judson H. Turner, Director (404) 656-4713

DEC 0 9 2013

Certified Mail.
Return Receipt Requested

Honorable John Gayle, Mayor City of Valdosta Post Office Box 1125 Valdosta, Georgia 31603-1125

RE: Consent Order No. EPD-WQ-5478
City of Valdosta Withlacoochee and
Mud Creek Water Pollution Control

Plants

Dear Mayor Gayle:

The public notice period for Consent Order No. EPD-WQ-5478 (Order) has ended and EPD received no comments. Therefore, enclosed is a copy of the executed Order. The City of Valdosta will be expected to comply with all conditions of the Order.

Your cooperation in this matter is appreciated.

Sincerely,

Judson H. Turner,

Director

JHT/kh Enclosure ENVIRONMENTAL PROTECTION DIVISION
OF THE
DEPARTMENT OF NATURAL RESOURCES

STATE OF GEORGIA

IN RE: CITY OF VALDOSTA

ORDER NO. EPD-WQ-5478

**CONSENT ORDER** 

WHEREAS, the City of Valdosta (City) was issued National Pollutant Discharge

Elimination System (NPDES) Permit Nos. GA0033235 and GA0020222 (Permits) by the

Director of the Georgia Environmental Protection Division (Director, EPD) for its Withlacoochee

Water Pollution Control Plant (WPCP) and Mud Creek WPCP, respectively, located in the

Suwannee River Basin; and

WHEREAS, the Permits authorize the City to discharge treated wastewater according to

effluent limitations, monitoring requirements, and other conditions set forth in the Permits, and

WHERAS, from January 1, 2008 to June 30, 2013, the City reported an excessive

number of effluent violations of Permit Nos. GA0033235 and GA0020222 (see Attachment 1);

and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive

number of raw sewage spills from its sanitary sewer collection system to waters of the State

(see Attachment 2); and

WHEREAS, Chapter 391-3-6-.05(2)(a) of the Rules and Regulations of the State of

Georgia for Water Quality Control (Rules) defines a spill as "any discharge of raw sewage by a

Publicly Owned Treatment Works (POTW) to the waters of the State"; and

WHEREAS, Chapter 391-3-6-.05(2)(b)(2) of the Rules defines a major spill, in part, as

"Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water

quality violations in the waters of the State"; and

WHEREAS, the City reported two fish kill events downstream of the November 18, 2009

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and February 21, 2013 spills; and

WHEREAS, on November 20, 2009 and February 22, 2013, the Wildlife Resources Division investigated the fish kill events (see Attachment 3); and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive number of major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules, from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State (see Attachment 4); and

WHEREAS, Chapter 391-3-6-.05(2)(b)(1) of the Rules defines a major spill, in part, as "The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit of biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids" [amended August 2012]; and

WHEREAS, Chapter 391-3-6-.03(3)(I) of the Rules defines waters of the State as any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation; and

WHEREAS, the spills to State waters documented in Attachments No. 1 and 2 of this Order meet the definition of a spill or major spill; and

WHEREAS, on March 31, 2009, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City's April 1, 2009 and April 14, 2009 letters, an estimated 50,300,000 gallons of raw sewage was discharged to the Withlacoochee River from March 31, 2009 to April 2, 2009; and

WHEREAS, on March 27, 2009, Governor Sonny Perdue declared Lowndes County to

be in a State of Emergency due to heavy rains and severe weather; and

WHEREAS, on April 23, 2009, President Barack Obama declared South Georgia counties, including Lowndes County, federal disaster areas; and

WHEREAS, in July 2009, the City applied for federal funding with the Federal Emergency Management Agency (FEMA) to secure approval of, and funding for, damages to the Withlacoochee WPCP from the flood of March 2009; and

WHEREAS, on December 7, 2009, the Mud Creek WPCP sanitary sewer manhole receiving all influent flow into the WPCP collapsed, along with associated piping, and, according to the City's December 14, 2009 report to EPD, an estimated 5,500,000 gallons of raw sewage spilled into Mud Creek from December 8, 2009 to December 13, 2009 spill; and

WHEREAS, in a letter to EPD, dated January 4, 2010, the City stated that during the December 8-13, 2009 major spill, a major leak was discovered by close circuit television equipment just downstream from one of the plugged influent lines, allowing significant groundwater inflow into the repaired manholes and lines; and

WHEREAS, on January 5, 2010, representatives of the City and EPD held a teleconference to discuss the City's sanitary sewer system; and

WHEREAS, during the January 5, 2010 teleconference, the City advised EPD of work completed on the sanitary sewer system, various initiatives implemented by the City since October 2008, and the City's commitment to continue to address its sanitary sewer system issues; and

WHEREAS, in a correspondence, dated January 6, 2010, the City submitted to EPD a Sanitary Sewer Condition Assessment and Rehabilitation Program, Condition and Criticality Report, and Sewer System Modeling and Capacity Evaluation Report (Assessment Program); and

WHEREAS, the City completed construction of the renovated Mud Creek WPCP

WHEREAS, on April 6, 2010, representatives of the City and EPD held a teleconference to discuss clarification of the City's Assessment Program and to request the City to submit updated schedules for completion of specific sewer system projects; and

WHEREAS, on April 21, 2010, at the request of the City, representatives of the City and EPD met to further discuss corrective actions to address the City's sanitary sewer system, the amount of work the City has completed with regard to its sewer system, and the City's commitment to continue to address its sanitary sewer system; and

WHEREAS, in April 2012, the City completed the renovation and expansion of the Mud Creek WPCP. Since completion of the renovations and expansion, the Mud Creek WPCP has met permit effluent limitations for pollutant parameters; and

WHEREAS, on August 1, 2012, the City was denied federal funding from FEMA; and WHEREAS, according to the City, the denial followed a final appeal prepared by FEMA staff and FEMA's external consultant, in which they concluded the proposed project to build a new force main system, equalization basin, headworks and relocation of the WPCP was eligible, feasible and cost effective; and

WHEREAS, in a letter dated October 23, 2012, the United States Environmental Protection Agency Region 4 (EPA) submitted a request to the City, under Section 308 of the Clean Water Act, for information regarding the Withlacoochee WPCP, the Mud Creek WPCP, and their associated sanitary sewer collection systems; and

WHEREAS, on February 28, 2013, at the City's request, the City met with EPA to discuss the City's sanitary sewer system issues and plans to address those issues, including funding alternatives and timelines of completion. In addition, the City requested that EPA allow them to work directly with EPD on a corrective action plan; and

WHEREAS, on February 28, 2013, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather; and

WHEREAS, on March 13, 2013, a meeting was held between the City and EPD to discuss recent flooding issues at the Withlacoochee WPCP and the City's plans to address its sanitary sewer system issues, including specific projects, timelines and funding sources, as well as a proposed corrective action plan; and

WHEREAS, in a letter to EPD, dated March 14, 2013, the City stated that due to the flooding on February 28, 2013 the Withlacoochee WPCP was taken offline from February 28, 2013 to March 3, 2013 and as a result an estimated 19,150,000 gallons of raw sewage was discharged to the Withlacoochee River; and

WHEREAS, on March 19, 2013, EPA and EPD held a teleconference to discuss the City's response to EPA's October 23, 2012 Section 308 information request and corrective actions to address the City's sanitary sewer system issues; and

WHEREAS, on April 10, 2013, the City submitted to EPD a document titled "Corrective Action Plans and Schedules" which includes completion dates for corrective actions within the City's sanitary sewer collection system and relocation of the Withlacoochee WPCP (see Attachment 6); and

WHEREAS, on April 11, 2013, following review of the City's response to the Section 308 information request, EPA submitted to EPD via electronic mail comments regarding the City's "Sewer Overflow Response and Reporting Procedures" (see Attachment 5a); and

WHEREAS, on April 15, 2013, the City submitted via electronic mail a list of sanitary sewer projects completed by the City from 2009 to present with a total expenditure amount of \$49,453,784 (see Attachment 7), including the renovation and expansion of the Mud Creek WPCP, which was completed in April 2012; and

WHEREAS, on April 23, 2013 the City submitted via electronic mail an interim plan for meeting permit compliance at the existing Withlacoochee WPCP; and

WHEREAS, according to the City, on April 25, 2013, the Mayor and City Council adopted a five (5) year action plan to address the City's sanitary sewer system issues, including the relocation of the Withlacoochee WPCP; a new force main to the Withlacoochee WPCP; an equalization basin; a new headworks facility at the Withlacoochee WPCP; inspection of all sewer lines and manholes with associated repairs; and short term improvements to the existing Withlacoochee WPCP; and

WHEREAS, on September 11, 2013 the City transmitted to EPD via electronic mail a revised "Sewer Overflow Response and Reporting Procedures" in response to EPA's and EPD's comments (See Attachment 5b); and

WHEREAS, Part II.A.1. of the Permits requires the permittee to maintain and operate as efficiently as possible all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with the permit; and

WHEREAS, Section 12-5-29(a) of the Georgia Water Quality Control Act (Act) makes it unlawful to use any waters of the State to dispose of sewage or other wastes, except in such a manner as to conform and comply with the Code and all rules, regulations, orders, and permits established under the Code; and

WHEREAS, Section 12-5-23(c)(12) of the Act provides the Director the authority to issue orders as may be necessary to control, abate, and prevent pollution of the waters of the State; and

WHEREAS, Section 12-5-52(a) of the Act specifies that any person violating the Code or any permit condition or limitation established pursuant to the Code shall be liable to the State of Georgia for a civil penalty not to exceed \$50,000 per day for each day during which such violations continue; and

WHEREAS, the spills and Permit violations addressed in this Order are violations of the Permits, Rules, and Act.

#### NOW THEREFORE, the Director ORDERS and the City AGREES as follows:

- 1. Allocate, at a minimum, \$200,000 to complete a Supplemental Environmental Project (SEP). The SEP must go beyond standard compliance requirements and should result in improvement to water quality or water conservation. Any proposed SEP should not be part of a plan or requirement that the City is already in the process of implementing or that is otherwise required in order to comply with the Georgia Water Quality Control Act. Within sixty (60) days of the execution date of this Order, submit to EPD for review and approval a SEP plan and schedule with a completion date no later than December 31, 2016. Once approved by EPD, the SEP plan and schedule will become part of the Order.
- Complete the relocation of the Withlacoochee WPCP in accordance with the construction deadline as described in Action Item 1a and 1b in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the interim plan for meeting permit compliance at the existing Withlacoochee WPCP, submitted to EPD on April 23, 2013.
- 4. Complete Action Item Nos. 2-5 in accordance with the completion deadlines listed in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the revised "Sewer Overflow Response and Reporting Procedures", submitted to EPD via electronic mail on September 11, 2013.
- 6. Submit to EPD semi-annual progress reports for the SEP listed in Condition 1 this Order, and action items listed in Attachment 6 of this Order, by June 30<sup>th</sup> and December 31<sup>st</sup> of each year.

- 7. Consistent with timely review and approval by EPD, all plans, procedures, and schedules required by or referenced in this Order, are upon approval by EPD, incorporated into this Order. The City shall implement all approved plans, procedures, and schedules.
- 8. Upon receipt of any report, plan, or schedule; or any portion of a report, plan, or schedule; or any revised report, plan, or schedule; or any revised portion of a report, plan, or schedule; or any written response (hereinafter collectively "document") required under this Order, EPD shall review said document to determine its completeness with regard to the Act, Permit, and this Order. If EPD determines that said document is complete. EPD shall notify the City in writing that said document is approved. If EPD determines that said document is incomplete, EPD shall provide the City with written notice of any deficiencies. The City shall have sixty (60) days from receipt of the written notice of deficiencies to submit a modified document to EPD unless otherwise specified by EPD. Should the City take exception to all or part of EPD's notice of deficiencies, the City shall, within fifteen (15) days after receipt of the written notice of deficiencies, submit to EPD a written statement of the grounds for the exception. EPD and the City shall confer by telephone or in person in an attempt to resolve any disagreement. If agreement is reached, the resolution shall be written and signed by representatives of each party. If agreement cannot be reached within thirty (30) days from the date of the City's receipt of the notice of deficiencies unless otherwise specified by EPD. the City shall revise the document as required by EPD and resubmit the revised document in accordance with a schedule to be specified by EPD

This Order does not waive EPD's authority to take further enforcement action, or imply

that EPD will not take such action, if the City (1) fails to meet applicable Permit effluent limits, (2) or the City does not fully satisfy the conditions of the Order, or (3) fully comply with other relevant requirements.

This Order is not a finding, adjudication of, or evidence of a violation of any State law by the City nor does the City by its consent agree to any violations of State laws nor admit any liability to any third party or parties.

This Order does not relieve the City of any obligation or requirements of the Permits.

This Order is final and effective immediately, and shall not be appealable, and the City waives any hearing on its term and conditions.

It is so ORDERED, CONSENTED, and AGREED TO this Har day of December.

2013.

FOR THE DIVISIONS

Judson H. Turner

Director

FOR THE CITY

BY (print name): Henry His

SIGNATURE

TITLE Utility Director

DATE: <u>September 23,2013</u>

## GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# **ATTACHMENT 1**

Permit Effluent Limitation Violations
Withalcoochee WPCP (GA0033235) and Mud Creek WPCP (GA0020222)
January 2008 to July 2013

# City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

# Withlacoochee WPCP GA0033235

	*		
Parameter	<u>Date</u> !	<u>Permit Limit_R</u>	eported Value
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Feb-08	1706	1970
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-08	30	44.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-08	45	141
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-08	1365	2458
Total Suspended Solids Weekly Maximum Loading, kg/Day	Feb-08	1706	7814
Total Suspended Solids Percent Removal	Feb-08	85%	80.8%
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-08	1706	2315
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-08	400	1041
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Aug-08	379	623
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	1137	, 131,1
Dissolved Oxygen Minimum, mg/L	Apr-09	5.0	3.0
Total Suspended Solids Weekly Maximum Concentration, mg/L	Apr-09	45	59.6
Total Suspended Solids Weekly Maximum Loading, kg/Day	Apr-09	1706	3355
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Apr-09	400	58281
		,,,,	00201
Ammonia Weekly Maximum Concentration, mg/L	May-09	6.4	7
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Jan-10	853	970
Total Suspended Solids Weekly Maximum Concentration, mg/L	Jan-10	45	62
Total Suspended Solids Weekly Maximum Loading, kg/Day	Jan-10	1706	3396
Ammonia Weekly Maximum Concentration, mg/L	May-10	6.4	15.7
Ammonia Weekly Maximum Loading, kg/Day	May-10	204	366
Animonia Weekly Maximum Edading, kg/Day	May-10	204	300
Ammonia Monthly Average Concentration, mg/L	Aug-11	2.0	2.9
Ammonia Weekly Maximum Concentration, mg/L	Aug-11	3.0	4
Ammonia Weekly Maximum Loading, kg/Day	Aug-11	76.0	80.1
Augustain Mariana Composition and	, C== 14 <sup>†</sup>	2.0	
Ammonia Weekly Maximum Concentration, mg/L	Sep-11	3.0	3.6
Ammonia Weekly Maximum Concentration, mg/L	Jul-12	3.0	3.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Sep-12	4.0	4.4
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Sep-12	6.0	8.3
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Sep-12	152	180.3
Ammonia Weekly Maximum Concentration, mg/L	Sep-12	3.0	3.5
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Sep-12	400	457.1
	•		
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Oct-12	4.0	4.5
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Oct-12	6.0	8.7
Ammonia Weekly Maximum Concentration, mg/L	Oct-12	3.0	5.8
Ammonia Weekly Maximum Loading, kg/Day	Oct-12	76	86.6

# City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

Withlacoochee WPCP GA0033235, cont.	•		
Parameter.	Date Pe	rmit Limit	Reported Value
pH Minimum, S.U.	Jan-13	6.0	
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-13	30	67.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-13	45	
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-13	1365	
Total Suspended Solids Monthly Monage Loading, Ng/Bay	1 00 10	1000	2410,0
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Mar-13	1706	3542.6
Total Suspended Solids Weekly Maximum Concentration, mg/L	Mar-13	45	149.4
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-13	1706	14624
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-13	400	35283
	F.		•
Mud Creek WPCP GA0020222	k.		
Parameter	Data Ba	rmit l imit	Reported Value
Parameter Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	rmit Limit 458	
Total Suspended Solids Weekly Waximum Loading, kg/Day	Aug-00	450	004
Effluent Flow Monthly Average, MGD	Jan-10∗	3.22	3.23
Effluent Flow Monthly Average, MGD	Mar-10	3.22	<b>3</b> .3
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Oct-10	400	1158
Ammonia Monthly Average Concentration, mg/L	Nov-10	1.5	3.8
Ammonia Weekly Maximum Concentration, mg/L	Nov-10	2.25	
Ammonia Monthly Average Loading, kg/Day	Nov-10	18	
Ammonia Weekly Maximum Loading, kg/Day	Nov-10	23	
Ammonia Weekly Waximum Loading, kg/Day	1404-10	20	
Effluent Flow Monthly Average, MGD	Feb-11	3.22	3.3
			*
Effluent Flow Monthly Average, MGD	Mar-11	3.22	3.3
Effluent Flow Monthly Average, MGD	Mar-12	3.22	3.3
Effluent Flow Weekly Maximum, MGD	Mar-12	4.03	4.8
Effluent Flow Monthly Average, MGD	Mar-13	3.22	
Effluent Flow Weekly Maximum, MGD	Mar-13	4.03	6.2
			•

Effluent Flow Monthly Average, MGD

Jul-13

3.22

3.4

### GEORGIA ENVIRONMENTAL PROTECȚION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# **ATTACHMENT 2**

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
	TRIBUTARY TO JOREE MILL POND			HEAVY RAIN, PRESSURE ALSO CAUSED FAILURE TO
2008-02-21	TO TWO MILE BRANCH	817 GORNTO ROAD	6,000	PREVIOUS SEWER REPAIR
t the state and	STILLHOUSE BRANCH TRIB TO		4:	And the second s
2008-02-21	WITHLACOOCHEE RIVER	3500 COUNTY CLUB ROAD	6,000	HEAVY RAINFALL
	DUKES BAY CANAL TRIBUTARY TO			
2008-02-21	MUD CREEK	108 TUCKER ROAD	18,000	HEAVY RAINFALL
2008-02-21	KNIGHTS CREEK	1001 PONDEROSA DRIVE	22,000	HEAVY RAINFALL
2008-02-22	TWO MILE BRANCH	608 HOWELL BROOK DRIVE	35,000	OVERLOAD DURING HEAVY RAIN
2008-08-23	KNIGHTS CREEK	1001 PONDEROSA DRIVE	The comment of the co	INFLOW
2008-11-30	WITHLACOOCHEE RIVER	HIGHWAY 133 @ I-75 EXIT 18	135,000	HEAVY RAINFALL
2009-02-19	TRIBUTARY TO CHERRY CREEK	LAKE LAURIE DRIVE	500	SANITARY OVERFLOW/ ELECTRICAL PUMP FAILURE
2009-04-03	SUGAR CREEK	2408 MEADOWBROOK DRIVE	10,001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2310 PARK LANE	10,001	EXCESSIVE RAIN
		1212 WAINWRIGHT DRIVE @ OLD		
2009-04-03	ONE MILE BRANCH	SUGAR CREEK WWTP	10,001	EXCESSIVE RAIN
2009-08-13	SUGAR CREEK	1314 BAYTREE ROAD	18,900	MANHOLE FALLEN INTÖ STREAM
2009-08-18	UNNAMED TRIBUTARY	KINDERLOU LIFT STATION	5,500	ELECTRICAL- DUE TO SCADA FAILURE
2009-08-26	DUKES BAY CANAL	210 DAMPIER STREET	3,000	GREASE BLOCKAGE
2009-11-11	SUGAR GREEK	1825 NORMAN DRIVE		BLOCKAGE OF GREASE AND RAGS
2009-11-18	ONE MILE BRANCH	1409 NORTH ASHLEY STREET	7,500	STORM WATER PIPE BROKE SEWER LINE

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2009-12-02	TWO MILE BRANCH	2408 NORTH PATTERSON	9,000	GREASE BLOCKAGE
2009-12-02	SUGAR CREEK	1825 NORMAN DRIVE	6,000	BLOCKAGE IN SEWER MAIN
2009-12-03	SUGAR CREEK	1815 NORMAN DRIVE	9,999	BLOCKAGE AND EXCESSIVE RAIN
2009-12-08	MUD CREEK	MUD CREEK WWTP	550,000	COLLAPSED MANHOLE
2009-12-09	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/EXCESSIVE RAIN/CLOGGED PUMPS
2009-12-10	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/HEAVY RAINS/CLOGGED PUMPS
2009-12-11	MUD CREEK'	MUD CREEK WWTP	1,350,000	DAMAGED MANHOLES
2009-12-12	MUD CREEK	MUD CREEK WWTP	950,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-13	MUD CREEK	MUD CREEK WWTP	350,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-22	SUGAR CREEK	1825 NORMAN DRIVE	14,000	GREASE AND RAGS
2010-01-21	TRIBUTARY TO KNIGHTS CREEK	1001 PONDEROSA DRIVE	12,100	INFLOW AND INFILTRATION (I&I), HEAVY RAIN
2010-01-21	DUKES BAY	700 ROGERS STREET	600	I&I, HEAVY RAIN
2010-01-21	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	138,000	I&I, HEAVY RAIN
2010-01-21	TRIBUTARY TO AN UNNAMED STREAM	700 CYPRESS STREET	64,000	i&I, HEAVY RAIN
2010-01-21	SUGAR CREEK	2408 MEADOWBROOK DRIVE	450,000	I&I, HEAVY RAIN
2010-01-21	DUKES BAY	400 SOUTH OAK STREET	6,000	I&I, HEAVY RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-01-21	TRIBUTARY TO TWO MILE BRANCH	817 GORNTO ROAD		I&I, HEAVY RAINS
2010-01-25	DUKES BAY CANAL	701 CYPRESS STREET	and the second s	MANHOLE COLLAPSED
2010-04-04	TWO MILE BRANCH	2408 NORTH PATTERSON STREET	de agrecologiste de meter destribuye y dres announce et mende en est de bandi	GREASE BLOCKAGE
2010-04-18	TRIBUTARY TO KNIGHTS CREEK	1201 PONDEROSA DRIVE		CDEASE DI OCVACE
2010-04-29	DUKES BAY CANAL	TUCKER ROAD		LINE BLOCKAGE
2010-06-14	DUKES BAY CANAL	613 SOUTH PATTERSON STREET		BROKEN PIPE
2010-09-27	ONE MILE BRANCH	212 EAST COLLEGE STREET	4	1&1
2010-09-29	SUGAR CREEK	1423 GORNTO ROAD		I&I DUE TO EXCESSIVE RAIN
2010-09-29	TRIBUTARY TO KNIGHTS CREEK	1003 PONDEROSA DRIVE	nadanga arin disabilian askin ashin ang maran ashin ad	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	Sporting and the second	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	ONE MILE BRANCH	212 EAST COLLEGE STREET	6,000	I&I DUE TO EXCESSIVE RAIN
2011-01-18	TRIBUTARY TO CHERRY CREEK	4036 BEMISS ROAD	27,000	GREASE BLOCKAGE
2011-02-07	THREE MILE BRANCH	825 NORTHWOOD PARK DRIVE	187,660	COLLAPSED SEWER
2011-10-12	TWO MILE BRANCH	2501 NORTH PATTERSON STREET @ PENDLETON DRIVE	500	GREASE BLOCKAGE
2011-10-13	TRIBUTARY TO LAKE SHERI	1307 NORTH SAINT AUGUSTINE ROAD	4,600	RAG BLOCKAGE

BEGIN DATE	WATERWAY IMPACTED.	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2011-11-29	SPRINGHOUSE CREEK	3350 PLANTATION DRIVE	9,000	BYPASS PUMP HOSE CONNECTION FAILURE
2012-03-03	CHERRY-CREEK	4119 BEMISS ROAD BEMISS ROAD PUMP STATION	24,000	PUMP STATION OVERLOADED BY HEAVY RAINS
201 <b>2</b> -03-03	SUGAR CREEK	2412 MEADOWBROOK DRIVE	12,000	HYDRAULIC OVERLOAD
2012-03-08	TRIBUTARY TO KNIGHTS CREEK	301 SOUTH BLANCHARD STREET	189,000	COLLAPSED SEWER MAIN
2012-06-05	TWO MILE BRANCH	NORTH ASHLEY STREET	1,800	SEWER BROKEN BY CONTRACTOR
2012-06-26	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,000	EXCESSIVE RAIN FROM TROPICAL STORM DEBBY
2012-07-11	SUGAR CREEK	2412 MEADÓWBROOK DRIVE	1,000	EXCESSIVE RAIN
2012-08-07	CHERRY CREEK	4119 BEMISS ROAD	1,000	LEAKING PUMP
2012-08-16	WITHLACOOCHEE RIVER	EXIT 18 @ HIGHWAY 133	2,500,000	PUMP STATION FAILURE
2012-08-16	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,500,000	BOTH PUMPS AT PUMP STATION FAILED
2013-02-21	KNIGHTS CREEK	3891 INNER PERIMETER ROAD	20,000	GREASE BLOCKAGE
2013-02-25	CHERRY CREEK	4119 BEMISS ROAD	173,000	HYDRAULIC OVERLOAD
2013-02-25	SUGAR CREEK	626 SCOTT DRIVE	720,000	EXCESSIVE RAIN
2013-02-25	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,290,000	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	ROUSE ROAD	590,500	EXCESSIVE RAIN
2013-02-25	TWO MILE BRANCH	2420 MEÄDOWBROOK DRIVÉ	936,000	EXCESSIVE RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2013-02-25	TWO MILE BRANCH	817 GORNTO ROAD	53,750	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	1248 NORTH LEE STREET	19,200	EXCESSIVE RAIN
2013-02-25	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST	124,500	EXCESSIVE RAIN
2013-02-26	ONE MILE BRANCH	JOREE STREET	29,000	EXCESSIVE RAIN
2013-02-28	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,750,000	I&I, FLOODING FROM RAIN
2013-03-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	I&I, EXCESSIVE RAIN
2013-03-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	EXCESSIVE RAIN
2013-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,400,000	EXCESSIVE RAIN
2013-03-04	DUKES BAY CANAL	1810 SOUTH PATTERSON STREET	100,000	RUPTURED SEWER MAIN
2013-03-24	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST OF WITHLACOOCHEE RIVER BRIDGE	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1423 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	2412 MEADOWBROOK DRIVE	360,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	626 SCOTT DRIVE	300,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1404 GÓRNTO ROAD	20,000	EXCESSIVE RAIN
2013-07-22	TWO MILE BRANCH	2400 NORTH PATTERSON STREET	2,050	GREASE
2013-07-31	SUGAR CREEK	2400 MEADOWBROOK DRIVE	***************************************	POSSIBLE BLOCKAGE, UNDER INVESTIGATION

BEGIN DATE WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
	The state of the s	7	
2013-07-31 HIGHTOWER CREEK	600 SCOTT DRIVE	2,000	POSSIBLE BLOCKAGE

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# **ATTACHMENT 3**

EPD Fish Kill Investigations
November 20, 2009 and February 22, 2013

Fish Kill Investigation: One Mile Branch In Lowndes County, Georgia On November 20, 2009

> By Jeremy Wixson

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region
Fitzgerald, Georgia

November 24, 2009

On Thursday November 19, 2009 at 3:45 p.m., Bill Noelle (404-362-2624) of Georgia EPD telephoned the Bowen's Mill Office to notify us of a fish kill in the city of Valdosta in Lowndes County Georgia. Marty Snowden took the call and linked me in the field to let me know. I was planning to sample fish that night and was not able to get to Valdosta before dark. I telephoned Bill Noelle and left a message for him on Friday November 20, 2009. I then telephoned John Waite (229-292-0842 cell, jwaite@valdostacity.com), Environmental Manager with the City of Valdosta. John informed me that there had been a break in a wastewater line that occurred in the Coca-Cola Bottling Plant parking lot. The leak was first discovered by a work detail cleaning One Mile Branch. The City dispatched utility crews to determine the cause and make repairs to the line. It was an 8-inch vitrified clay pipe and the water in it was coming from businesses in the area including a large laundromat. They discovered the broken pipe on Wednesday November 18, 2009. To fix the pipe, they dammed up One Mile Branch just below the site the wastewater was entering the branch, and used a gasoline pump to pump the water back into the sewage system. They estimated that approximately 7,500 gallons was discharged to the Branch before they got the pump in place. On Thursday November 19, 2009, Utility Department staff was checking the Branch downstream of the break and noticed some dead fish in One Mile Branch. They called EPD, who in turn called us. Bill Noelle indicated that EPD staff would be investigating on November 20, 2009 as well.

Edward Zmarzly and Jeremy Wixson went to the location of the fish kill on November 20<sup>th</sup> and took water quality measurements at the North Lee Street crossing (Figure 1, WQ station 1) at 1230 hours, at the break site (Figure 1, WQ station 2) at 1244 hours, and at the Williams Street Crossing (Figure 1, WQ station 3) at 1348 hours. Water was flowing slowly in the branch, and in all locations live fish were observed. We then went to the site of the broken sewer line and began counting the fish observed according to species and size, working our way downstream until we no longer observed dead fish. The kill area was spread out from the location of the broken sewer line (Figure 1, purple marker by WQ station 2) to 0.69 miles downstream on the Valdosta State University Campus (Figure 1, purple marker between WQ stations 3 and 4). When we finished taking inventory of the dead fish, we went downstream to take a final set of water quality readings at the West Gordon Street Crossing (Figure 1, WQ station 4) at 1610 hours. We were unable to determine if the fish kill was a direct result of the broken pipe's effluent or from installation of a temporary dam used to catch the effluent.

We measured basic water quality with a YSI model 550 oxygen meter and a Hach portable water test kit model FF-1 (Table 1). Dissolved oxygen was lowest at the WQ station 1, which was a little shallower and slower moving than the other stations. The pH was highest at the location of the sewage line break (WQ station 2), but had become more neutral by the time it reached WQ station 3.

In total we found 510 dead fish with a total value of \$186.45 (Table 2), there was one crayfish also dead in the area. The cost of investigating the fish kill (Table 3) was \$1,215.99. The total value of the fish kill including the cost of investigation and the value of the fish killed was \$1,402.44.

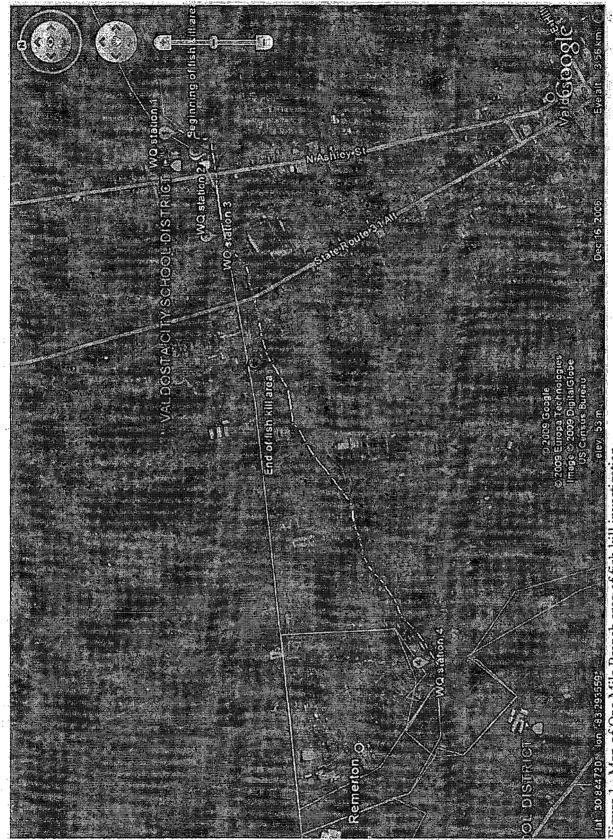


Figure 1. Map of One Mile Branch area of fish kill investigation.

Table 1. Water quality measurements made during the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Station Number	Time	Depth	Temperature	DO	рH	Hardness	Alkalinity	Dead Fish
and Location  1. N Lee Street 30.84862° N 83.27824° W	(hrs) 1230	(ft) Surface	(°C) 16.1	(ppm) 3.3	7	(ppm) 48.	(ppm) 12	ИО
2. Marion Street 30.84755° N 83.27940° W	1244	Surface	21.7	5.5	9	.60	24	YES
3. Williams Street 30.84748° N 83.28365° W	1348	Surface	16.3	4.2	6.5	44	24	YES
4. W Gordon Street 30.84041° N 83.30654° W	1610	Surface	17.5	8.15	6.5	36	24	NO

Table 2. Number and monetary value of dead fish from the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Species	Number of Dead Fish	Value (in dollars) <sup>a</sup>
American Eel Anguilla rostrata		2.37
-Golden Shiner	35	7.75
Notemigonus crysoleucas		1.73
Bullhead Catfish Ameiurus spp.	62	68.56
Mosquitofish  Gambusia spp.	196	25.48
Bluegill  Lepomis macrochirus	156	54.55
Redbreast Sunfish Lepomis auritus	59	27.44
Spotted Sunfish Lepomis punctatus	1	0.30
Total	510	186.45

Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

Table 3. Costs for the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

**		
Item	Amount	Cost (\$)
Personnel a	man and the state of the state	The state of the s
PS: Nat Res Biologists (WL)	20 hours	584.00
TS: Natural Resources Tech (AL)	21 hours	506.94
Vehicles		
129772	191 miles	105.05
Other		
Supplies	1 set	20.00
Total		\$1215.99

<sup>&</sup>lt;sup>a</sup> Cost includes fringe benefits

# REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water: Latitude-Longitude)					MAJOR RIVER BASIN	
One Mile Branch (Tributary to Withlacoochee River) 30.84755° N, 83.27940° W					Suwannee	
NEAREST TOWN	NEAREST TOWN COUNTY				DATE O	OF KILL
Valdosta		State of the section	Lowi	ıdes	Nove	mber 18, 2009
TYPE OF WATER BODY	,		DURAT	ION OF KILL (If know	n)	
☑ RIVER OR STREAM ☐ LAP	KE/POND	☐ ESTUARY	DAYS/H	iours <b>Several</b>	hours	\$
РО	LLUTIC	ON SOURCE - TY	PE O	F OPERATIO	N	
AGRICULTURAL OPERATIONS	<b>S</b>	INDUSTR	IAL OPER	RATIONS	Į	MUNICIPAL OPERATIONS
□ POISONS (pesticides)       □ MINING       □ TEXTILES         □ FERTILIZERS       □ FOOD & KINDRED       □ LEATHER & LEATHER         □ MANURE DRAINAGE, ENSILAGE       □ METALS       □ PRODUCTS         □ LUBBER & PLASTICS       □ PAPER & ALLIED         □ CHEMICALS       □ PRODUCTS         □ CHEMICALS       □ PRODUCTS         □ OTHER       □ OTHERS:			Anhai Sugar ama	SEWERAGE SYSTEMS  ☐ REFUSE DISPOSAL  ☐ WATER SYSTEM  ☐ SWIMMING POOL  ☐ POWER SYSTEM  ☐ PEST CONTROL  ☐ OTHER		
	TRANSPORTATION OPERATIONS  OTHER  RAIL   TRUCK   BARGE OR BOAT   IMPINGEMENT/ENTRAINMENT/DAM DESIGN   CONSTRUCTION   OTHER				de company	UNKNOWN
SPECIFIC POLLUT	ΓΑΝΤ Ο	R FACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC
RADIONUCLEIDES TEMPERATURE	☐ PETROLEU ☐ SEDIMENT	CHEMICALS UM (OIL & GREASE) FATION/SILTING IC CHEMICALS (METALS)	☐ PE	YGEN DEFICIENCY STICIDES, HERBICIDE KED CHEMICALS 'HER (specify):	ES, ETC.	□ pH □ TURBIDITY ⊠ UNKNOWN
EXTENT OF AREA AFFE	CTED	ESTIMATED OR A				KILLED (If known)
MILES OF STREAM A 0.69	CRES OF LA	NUMBER KILLED 510 — direct count		Builhead spp	l, Golden Shiner, o., Mosquitofish, Bluegill, unfish, Spotted Sunfish	
SEVERITY VALUE OF FISH KILLED  TOTAL HEAVY MOD MIGHT \$186.45						
ADDITIONAL REMARKS (include effects on other than fish, e.g., shellfish, waterfowl, etc.) Saw one dead Crayfish.						
INVESTIGATOR MAILING ADDRESS AND PHONE NUMBER 1773A Bowens Mill Highway Fitzgerald, GA 31750 229-426-5272						November 24, 2009
EPD FOLLOW-UP INVESTIGATION RE	FERRED TO:	: ACTIONS TAKEN (IF	known) (E	EPD)		WQMU (EPD)



MARK WILLIAMS COMMISSIONER

DAN FORSTER DIRECTOR

March 11, 2013

EDOMARRAMES

MAR 1 3 700

RECEIVED

MEMORANDUM

TO:

Jane Hendricks

EPD - Wastewater Regulatory Program

Marzieh Shahbazaz

EPD - Permitting, Compliance, and Enforcement

FROM:

Matt Thomas

Assistant Chief of Fisheries

SUBJECT:

Fish Kill - Knights Creek

Lowndes County, Georgia

February 22, 2013

Attached is copy of subject fish kill investigation report for your files. Please call me if you have questions.

int

cc: John Biagi

Bert Deener

Attachment

# Fish Kill Investigation in Knights Creek In Lowndes County, Georgia February 22, 2013

by Bryant Bowen

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region IV
Waycross, Georgia

Chad Sexton received notification of a fish kill in Knights Creek, Lowndes County on February 22, 2013 around 0945 hours from John Waite (229.292.0842) of Valdosta Water and Sewerage Department resulting from a sewage spill. The spill reportedly started around 2130 hours on February 20, 2013. The city located the spill at 1030 hours February 21, 2013 near the Chadwyck subdivision and repaired the overflowing manhole around 1430 hours. Mr. Waite reported an estimated 20,000 gallons of sewage spilled. Mr. Waite also reported that the department flushed the canal, with treated water, overnight using a nearby fire hydrant. Valdosta Water and Sewerage Department personnel picked up and iced around 30 dead fish on February 21, 2013. After receiving all pertinent information from Mr. Waite and gathering necessary equipment and additional staff, Jason Mitchell and Chad left Waycross to investigate.

Chad and Jason arrived at 1230 hours at the intersection of Inner Perimeter Road and Tyndall Dr. near the origin of the spill (Fig. 1). At this point, it started raining and continued to rain throughout the investigation. Mr. Waite met Chad and Jason around 1315 hours at Site #1 (Fig. 1) and reported that EPD had already been contacted. He relayed the spill history and actions taken by his department and handed over the previously collected dead fish. Based on Mr. Waite's information, there was nowhere to take water quality above or near the spill origin, which was a clogged manhole that overflowed municipal sewage into a ditch with little water in it. Here they encountered the remnants of the spill: the smell of raw sewage and visual debris. They measured basic water quality at all of the rest of the sites using a YSI model 85 oxygen/conductivity meter, a Hach portable water test kit model FF-1, and a YSI model 60 pH meter. They noted that the total hardness and specific conductance readings were elevated at the first site and dropped as they moved downstream. At the time of the investigation, none of the water quality readings were at levels typically capable of killing fish. Water temperatures dropped as they moved downstream, likely because of the heavy rainfall.

Jason and Chad counted and/or collected every visible dead fish between the spill origin and Site #2 (Jaycee Shack Road) but were unable to collect dead fish between Sites #2 and #3 due to lack of access, deeper water, and an impenetrable understory. Therefore, the number of dead fish was estimated using an expansion factor. The expansion factor was determined by dividing the total number of segments by the number of segments in which fish were collected. In this case, we had 5 total segments and were able to collect fish from 2 of those. This provided us with an expansion factor of 2.5.

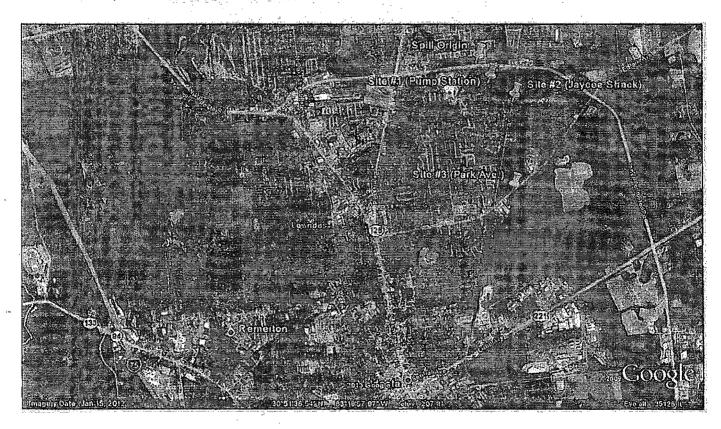
They observed no live fish at any of the 3 sites, mainly because of the reduced visibility caused by the heavy rainfall. The water quality at the last site had improved and no dead aquatic organisms were detected within 200 ft. upstream of Park Avenue. Therefore we determined this was the terminus of the 1.58 mile long fish kill. It was at this point that the field investigation ended. Due to heavy rainfall, Chad and Jason returned to the Waycross Regional Fisheries Management Office to work up all collected dead fishes with Bert Deener.

The initial cause of the fish kill appears to be an oxygen depletion caused by overloading of nutrients from raw sewage into Knights Creek. The system was also flushed with treated city drinking water from a fire hydrant. The total estimated number of fish killed was 469, and the value of these fish was \$219.59 (Table 2). Additionally, 17 crayfish and 16 bullfrog tadpoles were killed. The cost of the investigation was \$845.36 (Table 3). The total cost of the dead fish and the investigation was \$1064.95.

# REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water: Latitude-Longitude)					MAJOF	MAJOR RIVER BASIN		
Knights Creek						Alap	Alapaha / Suwanee	
NEAREST TOWN				COUNT	TY		DATE OF KILL	
Valdosta				Lown	ides	<b>– 2/21/2013</b>		
TYPE OF WATER BODY				DURATI	ON OF KILL (If know	/n)	A STATE OF S	
⊠ RIVER OR STREAM ☐ LA	KE/POND		ESTUARY	DAYS/HOURS ~ 18 hrs.				
PC	DLLUTI	ON S	OURCE - TY	PE O	F OPERATION	NC	and a supplied a first of the Conference of	
AGRICULTURAL OPERATION	IS		INDUSTRI	AL OPER	ATIONS		MUNICIPAL OPERATIONS	
☐FERTILIZERS ☐			FOOD & KINDRED PRODUCTS METALS RUBBER & PLASTICS CHEMICALS PETROLEUM		☐ TEXTILES ☐ LEATHER & LEATHER PRODUCTS ☐ PAPER & ALLIED PRODUCTS ☐ LUMBER & WOOD PRODUCTS ☐ SAND & GRAVEL		SEWERAGE SYSTEMS REFUSE DISPOSAL WATER SYSTEM SWIMMING POOL POWER SYSTEM PEST CONTROL OTHER	
TRANSPORTATION OPERATION RAIL TRUCK BARGE COLOR AIR PIPELINE OTHER	•		OTHER INGEMENT/ENTRAINMENT/DAM DESIGN NSTRUCTION □ OTHER				UNKNÓWN	
SPECIFIC POLLU	TANT	OR F	ACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC	
☐ NUTRIENTS ☐ RADIONUCLEIDES ☐ TEMPERATURE ☐ CYANIDES AND PHENOLS	SEDIME	EUM (OIL	. & GREASE) /SILTING MICALS (METALS)	☐ PES ☐ MIX ☑ OTH	GEN DEFICIENCY STICIDES, HERBICID ED CHEMICALS 4ER (specify): Poss with city water and/or	ble chlo	UNKNOWN UNKNOWN Ine poisoning from flushing	
EXTENT OF AREA AFF	ECTED		ESTIMATED OR A	CTUAL	SPECIES	OF FISH	i KILLED (if known)	
			NUMBER KILLED	Lake chubsucker, Warmouth, Spotted sunfish, Largemouth bass, Redfin			Varmouth, Spotted	
SEVERITY VALUE OF FISH I				ILLED	pickerel, Chain pickerel, Redbreast sunfish, Goldfish, Unidentified sunfish, Bluegill sunfish, Bluespotted sunfish, Gambusia, Lined topminnow, Swamp darter, Brook silverside, Flat bullhead			
ADDITIONAL REMARKS (Include effe					•	ayfish	, 16 Tadpoles,	
			ING ADDRESS AND	PHONE N	UMBER		DATE OF REPORT	
Chad Sexton Jason Mitchell P.O. Box 2089 Waycross, GA 31502 (912)285-6094						·	2/26/2013	
EPD FOLLOW-UP INVESTIGATION R	EFERRED T	O.:	ACTIONS TAKEN (IF	known) (E	PD)		WQMU (EPD)	

Figure 1. Map of study area for the fish kill investigation on Knights Creek in Valdosta, Lowndes County, GA on February 20-22, 2013.



	Legend	
Spill Origin	30°52'58,91"N	83°15'29.50"W
Site # 1 (Pump Station)	30°52'46.42"N	83°15'22.86"W
Site #2 (Jaycee Shack)	30°52'33.77"N	83°15'8.27"W
Site #3 (Park Avenue)	30°51'40.78"N	83°15'16.42"W

Figure 2. Photo of manhole that was the spill origin (photo taken on February 22, 2013).

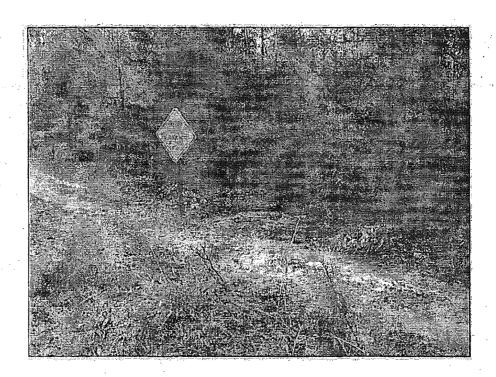


Figure 3. First road culvert holding water near spill origin (taken on February 22, 2013).

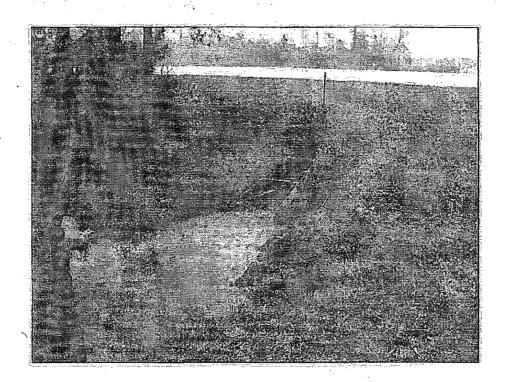


Table 1. Water quality measurements made during the fish kill investigation on Knights Creek in Lowndes County February 22, 2013 including GPS coordinates.

Station name or location	Time (hrs)	Water depth (ft)	Water Temp (°C)	D.O. (ppm)	pН	Total hardness (ppm)	Total alkalinity (ppm)	Specific conductance (µs)	Dead fish	GPS coordinates
Site # 1 (Pump Station)	1350	Surface	18.5	5.6	6.2	154	68	306	Yes	30°52'46.42"N 83°15'22.86"W
Site #2 (Jaycee Shack) Road	1430	Surface	16.4	6.1	6,1	68	34	252	Yes	30°52'33.77"N 83°15'8.27"W
Site #3 (Park Avenue)	1536	Surface	15.4	7.01	6,1	68	68	91	No	30°51'40.78"N 83°15'16.42"W

Table 2. Number and monetary value of dead fish from the fish kill investigation in Knights Creek, Lowndes County, on February 20 - 22, 2013.

Species	Number of dead fish b	Value (\$) a/b
Lake chubsucker	26	71.05
Erimyzon sucetta	20	21.85
Flat bullhead	33	25.00
Ameiurus platycephalus	3,3	23.00
Western mosquitofish	8	1.04
Gambusia affinis		1.04
Redbreast sunfish	225	75.75
Lepomis auritus	han had sal	73.73
Warmouth	40	16.23
Lepomis gulosus	40	10.23
Bluegill	10	3.15
Lepomis macrochirus		5.15
Spotted sunfish	68	21.36
Lepomis punctatus		21,50
Largemouth bass	15	24.58
Micropterus salmoides	10	2,430
Redfin pickerel	10	15.97
Esox americanus	10	2013 /
Chain pickerel	3	4.29
Esox niger	~	
Goldfish	5	2.05
Carrassius auratus auratus	· ·	. 2,32
Bluespotted sunfish	<b>a</b> .	0.04
Enneacanthus gloriosus	3	0.81
Lined topminnow	_	
Fundulus lineolatus	5	0.54
Swamp darter		,
Etheostoma fusiforme	10	4.22
Brook silverside	•	0.77
Labidesthes sicculus	3	0.75
Unidentified sunfish	0	0.00
•	8	2.00
Total	469	\$219.59

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

b Expanded value = number counted multiplied by an expansion factor.

The expansion factor = total number of segments/number of segments sampled = 5/2 = 2.5

Table 3. Costs for the fish kill investigation on the Knights Creek in Lowndes County from February 20-22, 2013.

<u>Item</u>	Amount	Cost (\$)		
Personnel a				
Fisheries Biologist I	8 hours	\$233.53		
Fisheries Technician III	12 hours	\$314.04		
Fisheries Technician II,	8.5 hours	\$194.57		
Regional Supervisor	1 hour	\$38.22		
Vehicles		•		
129823	130 miles	\$65.00		
Total	Market and the state of the sta	\$845.36		

<sup>&</sup>lt;sup>a</sup> Values include fringe benefits.

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

ATTACHMENT 4
City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1)
January 1, 2008 to July 31, 2013

# City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY REPORTED CAUSE
2008-01-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,473,000 HYDRAULIC OVERLOAD, CAUSED BY RAIN
2008-02-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, INFLOW AND INFILTARION (I/I) DURING WEEK 7,700,000 OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2000-02-21	WITTEACOCTEE RIVER	3332 WEIRENINGTON LANE	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,500,000 5" on 2/21 and 2" on 2/22
2008-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 15,200,000 5" on 2/21 and 2" on 2/22
2008-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 16,400,000 5" on 2/21 and 2" on 2/22
2008-04-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN CAUSED HIGH PEAK FLOW LEADING TO 10,600,000 HYDRAULIC OVERLOAD OF SECONDARY CLARIFIERS
2008-08-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,200,000 HYDRAULIC OVERLOAD
2008-08-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16,900,000 HYDRAULIC OVERLOAD
2008-08-26	MUD CREEK	1638 NEW STATENVILLE ROAD	6,300,000 HYDRAULIC OVERLOAD FROM TROPICAL STORM FAY
2008-11-29	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,500,000 I&I, HEAVY RAINFALL
2009-01-27	MUD CREEK	1638 NEW STATENVILLE ROAD	2,700,000 CLOGGED ACTIVATED SLUDGE TUBES
2009-03-31	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,800,000 HIGH SOLIDS IN EFFLUENT FLOW AND EXCESSIVE RAIN
2009-04-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	18,300,000 EXCESSIVE RAIN
2009-04-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	24,800,000 FLOODING
2010-01-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,400,000  &I, HEAVY RAIN
2010-01-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	14,900,000 INFLOW FROM HEAVY RAIN

# City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEĞIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,000,000	INFLOW FROM HEAVY RAIN
2010-03-11	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,200,000	INFLOW FROM HEAVY RAIN
2010-04-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	5,900,000	BIOLOGICAL UPSET OF SECONDARY TREATMENT SYSTEM
2011-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,100,000	RAIN INDUCED, HYDRAULIC PROBLEM AT PLANT
2011-02-10	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,300,000	HYDRAULIC OVERLOAD
2011-02-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,825,000	MECHANICAL FAILURE
2012-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,380,000	HYDRAULIC OVERLOAD OF WPCP SECONDARY SYSTEM
2013-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,047,000	HYDRAULIC OVERLOAD
2013-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	11,673,000	HYDRAULIC OVERLOAD
2013-02-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,173,000	EXCESSIVE RAIN
2013-07-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,600,000	HYDRAULIC OVERLOAD, EXCESSIVE RÀIN
2013-07-24	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,950,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,500,000	HŸDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,000,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-30	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,200,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# ATTACHMENT 5a

EPA Comments on the City of Valdosta's Sewer Overflow Response and Reporting Procedures
April 11, 2013

EPA Comments on Sewer Overflow Response and Reporting Procedures:

City of Valdosta – Response to 10/23/2012 Section 308 Request (Attachments E and F)

#### Standard Operating Procedure (Attachment E)

- 1. Section II.A.1. If the crew confirms an overflow is occurring, then the start time recorded should be the initial time reported, or earlier if there is credible testimony, and not the time that the overflow was discovered by the crew. This should also be reflected in the process diagram.
- 2. Section II.A.5. Additional instruction concerning the perspective(s) and settings for the photographs is likely needed to ensure photos are taken that are of use in making estimations.
- 3. Section II.A.6. Additional instruction concerning procedure for measurements is likely needed to ensure measurements are obtained accurately.
- 4. Section II.A.9. Identification of the name of the waters is also necessary for reporting purposes.
- 5. Section II.B.2. Additional instruction concerning how to document causal observations is likely needed to ensure the information collected has consistent specificity.
- 6. Section III.D. Washing down the area after application of the disinfectant could still result in pollutants to the storm drain. Quarantining and collecting the wash water, or instructing that no wash water is to be directed or drained to the storm drain may be a prudent addition.
- 7. Section IV. Direction regarding how to respond and communicate back-ups to basements or homes due to the sewer overflow conditions is needed.
- 8. Section IV. Direction regarding how to record and communicate sewer overflows that do not reach waters of the state is needed.
- 9. Process diagram. Start time of overflow should be specified as noted above. More than one picture may be taken.

# Methods of Estimation

The two page document (Attachment F) offers insufficient instruction for performing the estimations of discharge. Valdosta needs to formalize its techniques and attach instruction to the standard operating procedure.

## GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### **ATTACHMENT 5b**

The City of Valdosta's Revised Sewer Overflow Response and Reporting Procedures
September 11, 2013

# Standard Operating Procedure Sanitary Sewer Overflow Response and Reporting

The purpose of this document is to establish a standard procedure for responding to and reporting sanitary sewer overflows from the City of Valdosta collection system. All sanitary sewer overflows require immediate response to stop the overflow and secure the affected area to protect public health. All overflows must be investigated to determine the cause and any contributing factors. Finally, all overflows must be documented to fulfill regulatory requirements and to provide information for future collection system improvements and repairs. Any sanitary overflow that allows untreated wastewater to enter waters of the state must be reported to the Environmental Protection Division (EPD), to the local media, and to the health department as required under the Georgia Rules for Water Quality Control section 391-3-6-.05 Emergency Actions.

#### I. Definitions:

#### "Major Spill" means:

- 1. The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit for biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids.
- 2. Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water quality violations in the waters of the State.

"Spill" means any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to waters of the state.

"Waters of the State" means any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation. (O.C.G.A. 12-5-22)

#### II. Identification of sanitary sewer overflow:

A. When a report of an overflow is received a utilities department crew must be dispatched to confirm that an overflow does exist. If the report is received after normal working hours the standby crew must respond. Upon locating and confirming the overflow the responders must follow procedures to document the overflow and aid in determining the extent of the overflow. Supervisors responding to the overflow will be able to help collect information and will make sure that all needed information is gathered.

- 1. Record the date and time the overflow began. This will be the time the initial report was received, or earlier if there is credible testimony to support the earlier time.
- 2. Report the overflow to the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager.
- 3. Advise the Collections Supervisor or standby supervisor of conditions and what equipment may be needed to stop the overflow
- 4. Check downstream manholes to determine if there is a blockage and to identify the approximate position of any blockage.
- 5. Document the overflow with pictures before removing the manhole cover, these pictures will be used to help estimate the rate of flow. When taking pictures of the overflow:
  - a. Use a digital camera on automatic settings.
  - b. The camera must be set to the correct date and time, the date stamp option must be on so that the date will appear on the picture
  - c. Take at least one picture from the side of the manhole with a ruler in place to display the height of the sewage coming from the vents or around the manhole frame. If there are multiple vents discharging then more than one picture should be taken measuring the height of flow at different locations along the arc of the manhole cover.
  - d. Take one picture from above the manhole lid to document the number of vents releasing sewage or the percentage of the frame involved in the overflow.
  - e. Takes pictures of the sewage stream leaving the manhole, any ponds or pools of sewage for documentation. The size of these pools will be measured to estimate the volume in the pool.
- 6. Document information necessary to help determine the volume of the overflow. Since the conditions at each overflow will be different, there is no single method of determining total volume of sewage discharged that will be appropriate for all events. One or more of the following methods will be used. Appendix 1 contains detailed instructions for determining total volume.
  - i. For overflows from a manhole with the lid still in place, measure the depth of the spout of water at the rim or at the pick holes. Make a note of the depth measurement and where it was taken. Using a clock face record the areas overflowing and the measured height of the water at each five minutes of circumference. (Example: height of 1 inch from 1:00 to 2:00, height of ½ inch from 2:00 to 3:00, etc.
  - ii. For contained overflows map the containment area and measure the wetted area, including depth measurements.
  - iii. For runoff in a defined channel such as against a curb measure the width of the channel, the average depth, and the velocity of flow.
- 7. Follow the sewage stream to determine if the sewage is reaching waters of the state or entering the storm sewer system
- 8. Document any place sewage is entering waters of the state or the storm sewer system with pictures

- 9. Make a note of the point that the sewage is entering waters of the state or the storm sewer system as closely as possible using temporary markers or by noting landmarks. The name of the waterway receiving the discharge must be recorded for proper reporting.
- 10. Inform the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager of any entry into state waters.

#### B. When the overflow has been stopped:

- 1. The responders must document the time that the overflow stopped. This information is required for reporting to the state. In addition, the rate of the overflow in gallons per minute and the duration of the overflow in minutes may be used to estimate the total volume released in gallons.
- 2. The responding crews will make on site observations to help determine the cause of the release. The crew should write on the work order form any physical indicators found such as rags, grease, broken pipe, dirt, bricks, etc. If any pictures can be taken of debris removed from the manhole or line, then these pictures will be helpful in determining the cause of the overflow. All such pictures should be taken using a digital camera in automatic mode with the date stamp turned on. A yardstick or ruler should be laid next to the debris to provide a size reference.

### III, Site Cleanup

- A. Collect as much of the sewage as possible using the vacuum truck
- B. Gather and remove sewage related debris and organic solids from the area.
- C. Using a solution of household chlorine bleach, such as Clorox or Purex, spray the affected area. Let the disinfectant remain in place for at least one-half hour. Recommended dosage of chlorine bleach is ¾ cup of liquid bleach to 50 gallons of water or 1 tablespoon of liquid bleach to five gallons of water.
- D. Wash down the area. Wash water applied after disinfection could still carry pollutants to the storm sewer system or a stream, therefore wash water must be directed away from any storm system inlet. Pools of wash water should be recovered using the vacuum truck.

#### IV. Reporting of overflows, spills, and major spills:

A. All overflows should be reported to the Environmental Manager so that a record can be kept of the location, amount, and cause of the overflow. Overflows that do not reach waters of the state will be on record with the Utilities Department. Any customers whose property is affected by the overflow should be told of the event and of all cleanup actions that have been done or are planned.

- B. If sewage does reach the waters of the state then reporting to the EPD is required, along with public notification. The required actions are listed in the Georgia Rules for Water Quality Control; section 391-3-6-.05 Emergency Actions.
  - 1. In the event of a spill: (less than 10,000 gallons released to waters of the state and no water quality violation)
    - a. The City must notify the EPD immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
    - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.
    - e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.

- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- 2. In the event of a "major spill" (over 10,000 gallons released or a water quality violation occurs) the same responses are required with some extra requirements:
  - a. The City must notify the EDP immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
    - 1. Date of the spill;
    - 2. Location and cause of spill:
    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
    - 1. Date of the spill;
    - 2. Location and cause of spill;
    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
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- g. The City must publish a notice of the major spill in the Valdosta Daily Times within seven days. The notice must include the items required in the initial report to EPD. Normally the Public Information Officer will arrange the public notice using a copy of the press release.
- h. The City must immediately begin a sampling program for the waterway affected by the major spill. Sample sites are selected upstream and downstream of the major spill site and are monitored for dissolved oxygen, temperature, pH, and fecal coliform. The Environmental Manager's staff will be responsible for selecting sites, collecting samples, and performing on site tests.
- C. Responding to backups to homes resulting from sanitary sewer overflows
- D. Recording of overflows that do not reach waters of the state
  - The Environmental Manager will maintain records of all sanitary sewer overflows whether or not there is discharge to the waters of the state. Therefore, all overflows must be reported to the Environmental Manager. In the event that the position of Environmental Manager is eliminated from the department organizational structure, the maintenance of overflow records will be reassigned by the Utilities Director, and the Standard Operating Procedure updated to reflect this change.
  - 2. The following information will be recorded for overflows that do not reach waters of the state:
    - a. Date and time the overflow began
    - b. Date and time the overflow ended
    - c. Location of the overflow
      - i. By address if one exists for the location
      - ii. By Latitude and Longitude if no address exists
      - iii. By manhole identification number if a manhole is involved
      - iv. By upstream and downstream manhole identification numbers is a pipe break is involved

- d. Cause of the overflow
- e. Volume discharged
- f. Volume recovered
- g. Final disposal of recovered sewage
- h. Description of cleanup

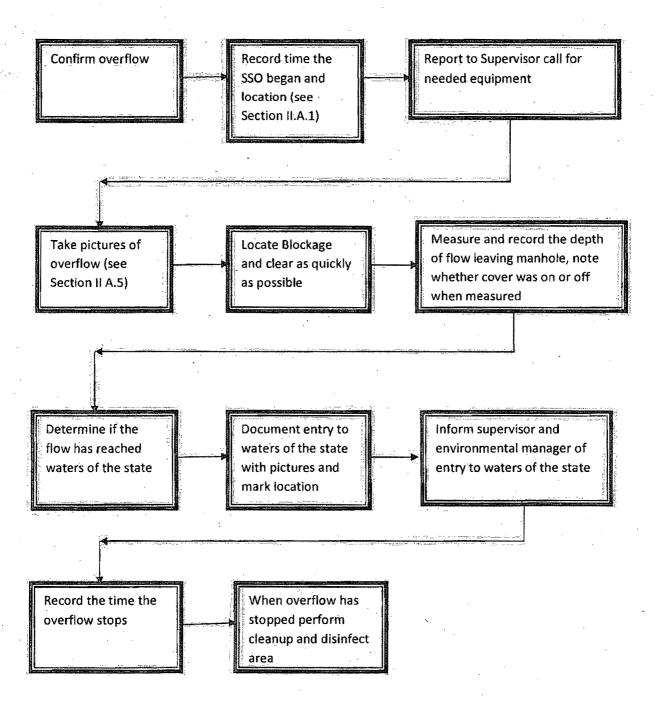
### E. Responding to backups that enter homes

- 1. The following information will be recorded for overflows that enter houses
  - a. Date and time of the backup
  - b. Address of the house
  - c. Name of the resident and owner
  - d. Cause of the overflow
  - e. Volume discharged
  - f. Volume recovered
  - g. Final disposal of recovered sewage
  - h. Description of cleanup
- 2. The collection system supervisor or crew leader will contact the Utilities Office Coordinator to report a backup into a residence
- 3. The Utilities Office Coordinator will arrange for professional cleaning services for the residence
- 4. The resident or home owner will be provided information on procedures for filing a claim

## City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date:	quantum trace ( )					
Type of Occurrence:	<del>in canaly species to the species of the species of</del>					
Date of Spill:	·					
Time Started or identified:						
Time Stopped:	economic and the second					
Location:	High a reason area. Imprise poly	· · · · · · · · · · · · · · · · · · ·		· Sacilia	· ·	
Amount:	•					
Did spill reach "Waters of the State"?	***************************************			•		•
Receiving water:	200 May 200 Ma		- ·			
Cause:						
Corrective Action:		٠.		-		
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		and the second of the second o		Bank de derroe (pa	10410 VIETA	and administration of the second
Upstream sampling site will be:				·		
Downstream sampling site will be:		•		<u>_10</u> 76+		
Reported by:			•	<del>inanje</del>		
Contact number					•	

## Sanitary Sewer Overflow Response Process



## Spill Documentation and Spill Volume Calculation Guidance

## **D.1 Spill Documentation**

Upon initial discovery of a spill, utility personnel should document and record the following information:

- Date;
- Time (based on best professional judgment, estimate the start time of the overflow prior to initial discovery or establish the start of the spill at the time of receipt of a customer service request reporting of a spill);
- Description of spill.
- Where it started;
- Where the spill discharged to (describe the nearest receiving water body and conduct a visual inspection for signs of algae, rags, raw sewage, and debris; also inspect and describe immediate upstream and downstream areas);
- Determine time period of long term spill events (evidence such as algae growth indicates a long term spill and it is estimated that algae growth occurs after one month of exposure to sewage); and
- Estimate volume since discovery of the spill.
- Use photographs to document all information possible.

## D.2 Spill Volume Calculation

The following sections provide guidance for estimating spill flow volume for manholes, broken pipes, wet weather, and pump station outage. This is provided as guidance only however, if a different method is used to calculate spill volume, that method should be validated and described.

#### D.2.1 Broken Lines

Table D-1 provides Spill Volume Calculation by Flow Rate for different size pipes.

VERSION 4/18/2006 D-2

### SANITARY SEWER FLOW RATES FOR SPILL DETERMINATIONS

Depth of									
(inches)	6	8	10	12	Pipe Siz	18	21	24	30
. <i></i>	15	20	25	30	35	40	45	50	100
2	50	60	70	80	85	95	105	125	
3.	90	110:	125	135	150	175	185	No.	145 230
4	126	160	180	200	235	260	285	210 320	
<del>1</del>	155	190	240	280	315	360	380		350
6	180	260	310	All Control Sections	and market and the second	A Contract of the Contract of	n karantan estanatan den	445	470
Parks House Street	100	A ST TO STA		355	415	455	500	555	630
7		290	370	425	495	570	620	895	770
8	Composition of the composition o	320	430	500	600	680	760	815	1010
9			465	575	690	800	890	965	1260
10	<u> </u>		490	625	775	905	1005	1120	1360
11			# 1	685	870	1020	1135	1275	1490
12		<u> </u>	:   } 5   \$	715	935	1130	1260	1410	1630
13					1020	1240	1415	1580	1870
14					1070	1345	1520	1690	2110
15	·		in the contract of	A Commence	1105	1425	1650	1850	2220
16			<u> </u>	**		1495	1760	1990	2560
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Gallons per Minute @ V=2.0 feet per second (ft/sec) and n=0.013; Adjust accordingly for flat or steep sloped sewers.

VERSION 4/18/2006 D.3

#### SPILL CALCULATION PROCEDURES

- 1. Determine and record the time of initial caller notification of sewer spill.
- Measure and record the flow in inches immediately downstream of spill or blockage and determine flow rate in gallons per minute (gpm) using table above. Record the pipe size in inches.
- Clear obstacles from blocked sewer, allow free and steady flow to stabilize. Note time the flow stabilizes.
- Measure the depth of flow in inches in the previously blocked sewer and determine flow rate from table above.
- 5. Subtract the flow rate from the downstream sewer determined in 2 above from the flow rate from the previously blocked sewer determined in 4 above and multiply the result by the elapsed minutes from notification to clearance.
- 6. Report total amount spilled to Supervisor or Superintendent

#### SEWER OVERFLOW AND SPILL PROCEDURES

- 1. 99% of all visible debris should be removed from the site.
- Areas where sludge is pooled should be pumped back into sewer.
- Site should be raked and limed to neutralize sludge accumulations.
- 4. Deodorant should be applied to neutralize odor problems.
- 5. Areas below where spill entered stream should be checked for visible debris or sludge on banks.
- 6. Crew Chief should document on Work Order extent of cleanup completed and note whether repeat visits for additional lime applications are needed.
- Crew Chief should insure that Supervisor or Superintendent has notified the GA
   EPD (during normal duty hours) or that Dispatch has notified GA EPD (during offduty hours). Telephone notification is required with backup letter report.
- 8. If spill has occurred at a national park, National Park Service also should be notified using same procedures as noted above.
- Supervisor or Superintendent should insure that spill location is entered into the GIS database.
- Superintendent and Division Manager should identify repeat locations and develop plan to eliminate further spills at these locations.

#### D.2.2 MANHOLE OVERFLOWS (Adapted from Guidance from GA EPD)

The following guidance can used in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used. The following manhole SSO quantification methods are provided as guidance.

VERSION 4/18/2006 D-4

## D.2.2.A Estimating Spill Flow rates for overflowing manholes

This is a visual estimating method. Please refer to Exhibit D-2 for the Reference Sheet. Source: City of San Diego Metropolitan Wastewater Department.

0-5

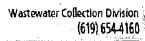
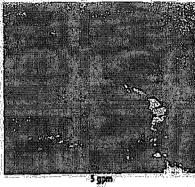
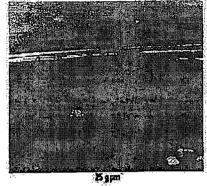


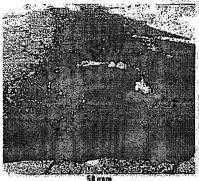


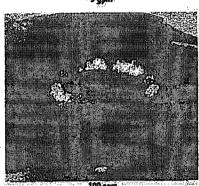
Exhibit D-2

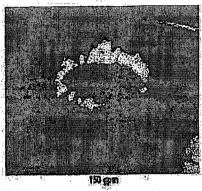


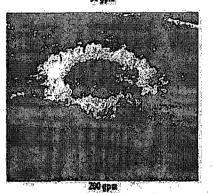
City of San Diego Metropolitan Wastewater Department

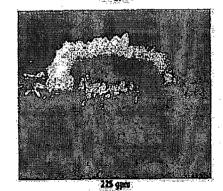


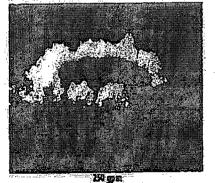


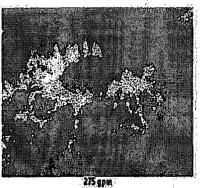












All photos were taken during a demonstration using metered water from a hydrant in cooperation with the City of San Diego's Water Department.

rex, 4/99

#### D.2.2.B Volume of SSO at Manhole

Length x Width x Depth x 7.48 = gallons Spill area = 20 feet by 30 feet = 600 sq. ft. Depths of spill = 3 inches = 0.25 feet Volume = 20 x 30 x 0.25 x 7.48 = 1,122 gallons

#### D.2.3 WET WEATHER OVERFLOW CALCULATION:

The following can be used to help in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used.

All calculations are based on an estimate of the size of the opening involved, the velocity of flow through the opening, and the duration of time the overflow occurred. In most all occurrences, the opening size and velocity will change over an event from low to high back to low. Judgment on an average condition must thus be attempted to reach a realistic rate of loss.

#### D.2.3.A. Loss through vent holes

1. Size of opening:

Assume holes at 1- inch diameter

Area = (number of holes) ( $\pi$ ) ( $D^2/4$ ) ( $1ft^2/144$ ) Area = (number of holes) (3.14) (1/4) (1/144)

Area = (number of holes)  $(0.0055ft^2/hole)$ 

#### 2. Velocity Plume Guide

Velocity through holes, based on Velocity Head = (Velocity<sup>2</sup>/2g)

Plume height	Velocity
1-inch	2.0 ft/sec
2-inch	3.3 ft/sec
3-inch	4.0 ft/sec
4-inch	4.6 ft/sec
5-inch	5.2 ft/sec
6-inch	5.7 ft/sec

#### 3. Time = convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example: Top with six hole, flow through holes makes a one-inch high plume,

last for 4 hours, 15 minutes

Volume =  $(6 \text{ holes } \times 0.0055 \text{ ft}^2/\text{hole}) (2\text{ft/sec}) (255 \text{ min}) (448 \text{ gpm/cfs})$ Volume = (0.033) (2) (255) (448) = 7540 gallons

#### D.2.3.B. Loss around edge of non-vented cover

#### 1. Size of opening:

As the weight of manhole lid will generally hold it in place until internal pressures exceed 0.4 pounds/sq. in., loss occurs through imperfections, grit, etc. between the lid and manhole frame. Observations are generally a vertical ring of water from side gap between the lid and frame of approximately ¼ inch width.

Area = 
$$(\pi)$$
 (D) (¼ inch) (1/12 in/ft)  
= (3.14) (2ft) (1/4) (1/12)

Area =  $0.131 \text{ ft}^2$ 

### 2. Velocity through gap

(see vertical plume guide above, D.3.A.2.)

#### 3. Time – convert to minutes

Example: Manhole with 4-inch plume around edge for 2 hours, 15 minutes

#### D.2.3.C. Loss from tilted cover

#### Size of opening:

Some estimate has to be made in the field concerning how much gap exists in order to do this calculation. For the following amounts of lift of one side, the areas are as follows:

A = 
$$(\pi)$$
 (D) (in of lift)  $(1/12 \text{ ft/in})$   $(1/2)$   
A =  $(3.14)$  (2ft) (in. of lift)  $(1/12)$   $(1/2)$   
A =  $0.262$  (in. of lift)

 Lift (inches)	Area (ft²)
To the second se	0.262
2	0.524
	0.786
4	1.048

#### 2. Velocity through opening

This must be estimated from visual observation. A low rate would be 2/ft/sec, moderate rate at 4 to 5 ft/sec, high rates up to 7 ft/sec. Over 7 ft/sec, the lid will

probably blow off the manhole. The gap (lift) will generally increase with higher velocity as well.

#### 3. Time – convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example:

Field observation of 2-inch gap and velocity of 4 ft/sec for a period of 3 hours, 30 minutes.

Volume (Gal.) =  $(0.524 \text{ ft}^2)$  (4ft/sec) (210min) (448) = 197,192 gallons

#### D.2.3.D. Loss from Manhole without a lid in place

If no cover exists, an estimate of the average height the water column (plume) extends above the top of the manhole frame must be made. Use the height to velocity estimate from (A) above to estimate the velocity. Be sure to adjust the height estimate downward for the affects of debris around the edge of the rim which will cause the height to be incorrectly high.

Area = 
$$(\pi)$$
 (D<sup>2</sup>/4) =  $(3.14)$  (2<sup>2</sup>/4) =  $3.14$  ft<sup>2</sup>

Velocity - from field observation of water column height

Time - convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example:

A manhole without a lid was observed to have an overflow with a 3 – high column of water for a period of 6 hours, 10 minutes

Volume (Gal.) = (3.14) (4.0 ft /sec) (370) (448) Volume = 2,081,946 gallons

#### D.2.3.E. Other

- 1. Generally approach of estimating a cross sectional area where the flow is leaving and a velocity of flow can be used to determine a rate. This can be applied to any situation.
- Several observations over an event to estimate the area and velocity are better than a single observation. The overflow examples above assume a constant rate over the period which will estimate volumes too high. As an example, if an hour at the beginning and end of each event is assumed for the flow to build up from zero to maximum and back to zero, a calculation could be done as follows:

Example:

A manhole with a cover tilted open 2 inched with an estimated velocity of 4 ft/sec at its worst rate of loss for two hours and about 1-inch tilt with a velocity of 2 ft/sec observed at two other occasion over a 7 hour total event.

Worst case: 2 hours, 2 inched tilt, 4 ft/sec
Other times: 1 inch tilt, 2 ft/sec, time unknown

Total overflow time: 7 hours

#### Divide total of 7 hours into several periods

1st hour:

Start to 1-inch tilt, 2 ft/sec

Volume (Gal.) = (Area) (Velocity) (Time) (448) x 50% = (0.262) (2) (60) (448) (0.50) = 7.043 gallons

7th hour:

1-inch tilt, 2 ft/ sec down to end

Same as above situation Volume = 7.043 gallons

5 remaining hours:

2 hours at 2-inch tilt, 4 ft/sec 3 hours at 1-inch tilt, 2 ft. sec

Volume = (0.524) (4 ft/sec) (120 min) (448) = 112,681 gallons

Volume = (0.262) (2 ft/sec) (180 min) (448) = 42,255 gallons

Event Total = 7,043 + 7,043 + 112,681 + 42,255 = 169,022 gallons

## GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## **ATTACHMENT 6**

Corrective Action Plans and Schedules Revised September 11, 2013

## Corrective Action Plans and Schedules

Action Item No.	Action Description	Completion Date
1a. (Phase 1)	Pump Station, Force Main, Headworks and Equalization Basin	July 2016
	Project: Design and construct two new master pump stations, two	
	smaller pump stations, a new force main, and a new headworks	
:	structure with grit removal and bar screens at the location of the	
	existing Withlacoochee WPCP. Complete construction of a 6.0 MG	
	equalization basin, which will be included at this site for initial wet	
7.1	weather flows and future flow equalization through the new	•
2 2 4	treatment plant. The flow from this project will be gravity fed to the	
	existing WPCP for final treatment and discharged utilizing the	
·	existing plant outfall. This project will replace an existing 54-inch	
,	gravity sewer main to the current plant as well as the existing	
:	influent pump station, both of which are highly prone to severe	
	inflow and flooding from the Withlachoochee River.	
1b. (Phase 2)	Relocation of Withlacoochee WPCP to new location 60 feet	August 2017
	above current flood level: Complete construction of the relocated	
	Withlacoochee WPCP. Upon completion, the relocated	
,	Withfacoochee WPCP will continue to use the existing	*
g 	Withlacoochee WPCP outfall on the Withlacoochee River.	
2.	Collection System Evaluation Program: Complete a 5-year	December
	system wide plan to evaluate the entire sanitary sewer collection	2018
	system (300 total miles of lines, with 75 miles already evaluated)	
	and develop a schedule for repairs. The evaluation will include	*
	the inspection of all manholes and collection system lines using	
•.	smoke testing first to be followed by Closed Circuit Television	
•	(CCTV) Inspections of high priority areas. The evaluation will be	*
	utilized to prioritize and perform critical repairs and to plan and	
	prioritize major rehabilitation projects for the future. A schedule to	•
,	complete major rehabilitation projects identified during the	
	evaluation will be submitted for EPD approval by December 2018.	
3,	Manhole Replacement/Rehabilitation Program: Continue	December
‡ ≥ f	implementing the existing program and complete the inspection of	2018
4.00 mg/s	approximately 3,390 remaining manholes (2,610 inspected to	
* 3	date). Prioritize replacement or rehabilitation of the most	
	deteriorated manholes. Complete the replacement or rehabilitation	
	of a minimum of 60 manholes each year until all Priority 1	
-	manholes are completed. A schedule will be submitted to EPD for	
	ongoing rehabilitation to address Priority 2, and all remaining	
or figure and the same of the	manholes, on an annual basis	- Carlotte in the State of the Control of the Contr
4a,	Lift Station Rehabilitation/Replacement Program: Continue	December
	implementing existing rehabilitation/replacement program until all	2018
	existing older lift stations are rehabilitated or replaced. This will	
Î	include connection to SCADA and/or auto-dialer systems, along	,
	with emergency power capabilities for connection to portable	

4b.	Purchase Portable Generators for lift stations: The purchase of three portable generators will be completed (one per year, with the first generator purchased by December 2014) so that any existing lift stations not wired with two independent electric feeds can be connected to a portable generator for emergency power needs. In addition to the generators, the City will work with Godwin Pumps to meet emergency bypass pumping needs at each lift station whenever needed.	December 2016
5.	Ongoing Repairs to the Existing Withlacoochee WPCP: Ongoing repairs to the existing Withlacoochee WPCP will be conducted to maintain permit compliance until such time as the new treatment plant is brought online. Present repairs include new bar screens and temporary blower system.	August 2017

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## **ATTACHMENT 7**

Sanitary Sewer Projects Completed By the City From 2009 to Present April 9, 2013

	Completed Sewer Projects from 2009 to Present	ent en en	the second second second second
No.	Project		Cost
1	CMMS for the Utility Department	\$	85,000
2.	Mud Creek Emergency Manhole Repair	\$	103,000
3	Withlacoochee Biosolids Converyor Repair (FEMA)	\$	52,000
4	Withlacoochee Multi-Media Filters Repair (FEMA)	\$	46,000
5	Replacement of SO2 and CL2 systems (FEMA)	\$	82,700.00
6	Replacement of Reuse system controls (FEMA)	\$	13,377.59
7	Eectronics dryout and replacement of pannels, transformers, and misc components (FEMA)	\$	169,277.00
8	30% Design for Force Main, EQ Basin and Lift Stations	\$	100,000
9	CCVT Evaluation of Mud Creek and Knights Creek Trunk Lines	\$	122,000
10	Cleaning of Withlacoochee Influent/Pump Station Wet Well	\$	373,000
11	Rehabilitation of Four Problematic Lift Stations	\$	1,500,000
12	Withlacoochee Nitrification Pump Replacement	\$	60,000
132	Withlacoochee-Influent Pump Station Impeller Replacement	: S	90,000
14	Withlacoochee RAS Controller Replacement	\$	36,000
15	Thickener pump replacement:	\$	53,068.00
16	Valve actuators for liftstation	\$	8,369.00
17.	3 - 14hp Wilo pumps	\$_	38,110.5
18	RAS pump impellers	Ŝ	33,642,0
19	4\Shp.submersible pumps	\$	20,154.0
20	Phase I Manhole Rehabilitation	\$	205,00
21	Country Club Emergency Manhole Repair	\$	72,00
22	Withlacoochee Roughing Tower Controller Replacement	\$	38,00
23	Purchase of 75-acres for Relocation of Plant	- S	1,012,50
24	Water and Sewer Rate Analysis	- <b>S</b> -	50,00
25	Construction of Tucker Road Lift Station	\$	204,00
26 S	Withlacoochee Belt Press Major Repairs	\$	52.00
27 27	Phase 2 Manhole Rehabilitation	\$	237,00
28	Goodyear Lift Station Rehabilitation	\$	104,00
29	CCTV work for Big County Lift Station Service Area	\$	108,00
and the second second	and the control of th		
30 v. 31	100% Design for Force Main, EQ Basin and Lift Station Withlacoochee Emergency Repairs for broken 20-inch Valve	\$ \$	3. 1,400,00 616,00
Mark Control		 \$	54,00
32 7	Withlacoochee Sludge Pump Replacement	Age made of	Allegan grant ann ag all an 1874. F
33	Blanchard Street Emergency Repairs	\$  }\$	234,00
34***	Temporary Bar Screens at Withlachoochee	77. K	104,77
35	Temporary Blower System at Withlachoochee	\$	376,13
36	Projected Easement costs for force main project	\$	370,00
37	Recent emergency repairs at Withlachooche follow Flood	\$	203,22
38	Repair to Tucker Road Outfall	\$	27,46
40	Mud Creek WPCP Expamnsion and Upgrades	.\$:	41,000,000
	Total:	\$	49,453,784

## Ammons, Brad

From:

Hembree, Kim <Kim.Hembree@dnr.state.ga.us>

Sent:

Wednesday, October 23, 2013 11:30 AM

To:

Ammons, Brad

Cc:

Shahbazaz, Marzieh; Hendricks, Jane

Subject:

RE: Copy of City of Valdosta Proposed Consent Order

Mr. Ammons,

The "Corrective Action Plan and Schedules" submitted as part of the proposed consent order includes the repair or replacement of the exiting gravity sewer main and influent pump station located in or near the Meadowbrook Drive area. According to the City, this will alleviate most of the spills in that area. The City states that this should be completed by July 2016. In addition, the City will simultaneously perform a 5- year system-wide evaluation of the entire collection system to locate and repair areas that are contributing to I/I issues.

Please let me know if you have any further questions.

Kim Hembree Environmental Specialist III Wastewater Regulatory Program Georgia Environmental Protection Division

Phone: 404.362.2605 Fax: 404.362.2691

From: Ammons, Brad [mailto:Ammons.Brad@epa.gov]

Sent: Tuesday, October 22, 2013 4:05 PM

To: Hembree, Kim

Cc: Shahbazaz, Marzieh; Hendricks, Jane

Subject: RE: Copy of City of Valdosta Proposed Consent Order

FYI, our Administrator received an email from someone who owns property along the Withlacoochee River (downstream) asking some very direct questions and claims to be an Attorney. I noted to her (in our response) that your proposed CO was online (for a few more days) for comment and put Kim's name/contact info down if this person wants to discuss the CO. Let me know if I should put someone else as a contact.......

Finally, we received a 60-day notice of intent to sue by an Attorney's office here in Atlanta representing several clients who appear to live along Meadowbrook Drive. Is there anything you all know that is relevant to this specific area of Valdosta?

#### **Brad Ammons**

Environmental Engineer Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F)

http://www.epa.gov/region4/water/wpeb/index.html

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From: Hembree, Kim [mailto:Kim.Hembree@dnr.state.qa.us]

Sent: Monday, September 30, 2013 10:07 AM

To: Ammons, Brad

Cc: Shahbazaz, Marzieh; Hendricks, Jane

Subject: Copy of City of Valdosta Proposed Consent Order

Kim Hembree Environmental Specialist III Wastewater Regulatory Program Georgia Environmental Protection Division

Phone: 404.362.2605 Fax: 404.362.2691

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## **Georgia Department of Natural Resources**

Environmental Protection Division • Watershed Protection Branch 4220 International Parkway · Suite 101 · Atlanta · Georgia 30354 (404) 675-6232; Fax (404) 675-6247 Judson H. Turner, Director

September 24, 2013

#### **MEMORANDUM**

TO:

Carol Weight

THRU:

Jane Hendricks

Marzieh Shahbazah Msh

FROM:

Kim Hembree IR

RE:

Proposed Consent Order No. EPD-WQ-5478

City of Valdosta Withlacoochee and Mud Creek WPCPs

Permit Nos. GA0033235 and GA0020222

The attached proposed consent order to be issued to the City of Valdosta is ready for public notice. The City's contact person and address is:

Honorable John Gayle, Mayor

City of Valdosta Post Office Box 1125

Valdosta, Georgia 31603-1125

MSH/kbh

Attachment

**ENVIRONMENTAL PROTECTION DIVISION** OF THE DEPARTMENT OF NATURAL RESOURCES

STATE OF GEORGIA

IN RE: CITY OF VALDOSTA

ORDER NO. EPD-WQ-5478

CONSENT ORDER

WHEREAS, the City of Valdosta (City) was issued National Pollutant Discharge

Elimination System (NPDES) Permit Nos. GA0033235 and GA0020222 (Permits) by the

Director of the Georgia Environmental Protection Division (Director, EPD) for its Withlacoochee

Water Pollution Control Plant (WPCP) and Mud Creek WPCP, respectively, located in the

Suwannee River Basin; and

WHEREAS, the Permits authorize the City to discharge treated wastewater according to

effluent limitations, monitoring requirements, and other conditions set forth in the Permits; and

WHERAS, from January 1, 2008 to June 30, 2013, the City reported an excessive

number of effluent violations of Permit Nos. GA0033235 and GA0020222 (see Attachment 1);

and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive

number of raw sewage spills from its sanitary sewer collection system to waters of the State

(see Attachment 2); and

WHEREAS, Chapter 391-3-6-.05(2)(a) of the Rules and Regulations of the State of

Georgia for Water Quality Control (Rules) defines a spill as "any discharge of raw sewage by a

Publicly Owned Treatment Works (POTW) to the waters of the State"; and

WHEREAS, Chapter 391-3-6-.05(2)(b)(2) of the Rules defines a major spill, in part, as

"Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water

quality violations in the waters of the State"; and

WHEREAS, the City reported two fish kill events downstream of the November 18, 2009

and February 21, 2013 spills; and

WHEREAS, on November 20, 2009 and February 22, 2013, the Wildlife Resources Division investigated the fish kill events (see Attachment 3); and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive number of major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules, from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State (see Attachment 4); and

WHEREAS, Chapter 391-3-6-.05(2)(b)(1) of the Rules defines a major spill, in part, as "The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit of biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids" [amended August 2012]; and

WHEREA'S, Chapter 391-3-6-.03(3)(I) of the Rules defines waters of the State as any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation; and

WHEREAS, the spills to State waters documented in Attachments No. 1 and 2 of this Order meet the definition of a spill or major spill; and

WHEREAS, on March 31, 2009, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City's April 1, 2009 and April 14, 2009 letters, an estimated 50,300,000 gallons of raw sewage was discharged to the Withlacoochee River from March 31, 2009 to April 2, 2009; and

WHEREAS, on March 27, 2009, Governor Sonny Perdue declared Lowndes County to

be in a State of Emergency due to heavy rains and severe weather; and

WHEREAS, on April 23, 2009, President Barack Obama declared South Georgia counties, including Lowndes County, federal disaster areas; and

WHEREAS, in July 2009, the City applied for federal funding with the Federal Emergency Management Agency (FEMA) to secure approval of, and funding for, damages to the Withlacoochee WPCP from the flood of March 2009; and

WHEREAS, on December 7, 2009, the Mud Creek WPCP sanitary sewer manhole receiving all influent flow into the WPCP collapsed, along with associated piping, and, according to the City's December 14, 2009 report to EPD, an estimated 5,500,000 gallons of raw sewage spilled into Mud Creek from December 8, 2009 to December 13, 2009 spill; and

WHEREAS, in a letter to EPD, dated January 4, 2010, the City stated that during the December 8-13, 2009 major spill, a major leak was discovered by close circuit television equipment just downstream from one of the plugged influent lines, allowing significant groundwater inflow into the repaired manholes and lines; and

WHEREAS, on January 5, 2010, representatives of the City and EPD held a teleconference to discuss the City's sanitary sewer system; and

WHEREAS, during the January 5, 2010 teleconference, the City advised EPD of work completed on the sanitary sewer system, various initiatives implemented by the City since October 2008, and the City's commitment to continue to address its sanitary sewer system issues; and

WHEREAS, in a correspondence, dated January 6, 2010, the City submitted to EPD a Sanitary Sewer Condition Assessment and Rehabilitation Program, Condition and Criticality Report, and Sewer System Modeling and Capacity Evaluation Report (Assessment Program); and

WHEREAS, the City completed construction of the renovated Mud Creek WPCP

WHEREAS, on April 6, 2010, representatives of the City and EPD held a teleconference to discuss clarification of the City's Assessment Program and to request the City to submit updated schedules for completion of specific sewer system projects; and

WHEREAS, on April 21, 2010, at the request of the City, representatives of the City and EPD met to further discuss corrective actions to address the City's sanitary sewer system, the amount of work the City has completed with regard to its sewer system, and the City's commitment to continue to address its sanitary sewer system; and

WHEREAS, in April 2012, the City completed the renovation and expansion of the Mud Creek WPCP. Since completion of the renovations and expansion, the Mud Creek WPCP has met permit effluent limitations for pollutant parameters; and

WHEREAS, on August 1, 2012, the City was denied federal funding from FEMA; and WHEREAS, according to the City, the denial followed a final appeal prepared by FEMA staff and FEMA's external consultant, in which they concluded the proposed project to build a new force main system, equalization basin, headworks and relocation of the WPCP was eligible, feasible and cost effective; and

WHEREAS, in a letter dated October 23, 2012, the United States Environmental Protection Agency Region 4 (EPA) submitted a request to the City, under Section 308 of the Clean Water Act, for information regarding the Withlacoochee WPCP, the Mud Creek WPCP, and their associated sanitary sewer collection systems; and

WHEREAS, on February 28, 2013, at the City's request, the City met with EPA to discuss the City's sanitary sewer system issues and plans to address those issues, including funding alternatives and timelines of completion. In addition, the City requested that EPA allow them to work directly with EPD on a corrective action plan; and

WHEREAS, on February 28, 2013, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather; and

WHEREAS, on March 13, 2013, a meeting was held between the City and EPD to discuss recent flooding issues at the Withlacoochee WPCP and the City's plans to address its sanitary sewer system issues, including specific projects, timelines and funding sources, as well as a proposed corrective action plan; and

WHEREAS, in a letter to EPD, dated March 14, 2013, the City stated that due to the flooding on February 28, 2013 the Withlacoochee WPCP was taken offline from February 28, 2013 to March 3, 2013 and as a result an estimated 19,150,000 gallons of raw sewage was discharged to the Withlacoochee River; and

WHEREAS, on March 19, 2013, EPA and EPD held a teleconference to discuss the City's response to EPA's October 23, 2012 Section 308 information request and corrective actions to address the City's sanitary sewer system issues; and

WHEREAS, on April 10, 2013, the City submitted to EPD a document titled "Corrective Action Plans and Schedules" which includes completion dates for corrective actions within the City's sanitary sewer collection system and relocation of the Withlacoochee WPCP (see Attachment 6); and

WHEREAS, on April 11, 2013, following review of the City's response to the Section 308 information request, EPA submitted to EPD via electronic mail comments regarding the City's "Sewer Overflow Response and Reporting Procedures" (see Attachment 5a); and

WHEREAS, on April 15, 2013, the City submitted via electronic mail a list of sanitary sewer projects completed by the City from 2009 to present with a total expenditure amount of \$49,453,784 (see Attachment 7), including the renovation and expansion of the Mud Creek WPCP, which was completed in April 2012; and

WHEREAS, on April 23, 2013 the City submitted via electronic mail an interim plan for meeting permit compliance at the existing Withlacoochee WPCP; and

WHEREAS, according to the City, on April 25, 2013, the Mayor and City Council adopted a five (5) year action plan to address the City's sanitary sewer system issues, including the relocation of the Withlacoochee WPCP; a new force main to the Withlacoochee WPCP; an equalization basin; a new headworks facility at the Withlacoochee WPCP; inspection of all sewer lines and manholes with associated repairs; and short term improvements to the existing Withlacoochee WPCP; and

WHEREAS, on September 11, 2013 the City transmitted to EPD via electronic mail a revised "Sewer Overflow Response and Reporting Procedures" in response to EPA's and EPD's comments (See Attachment 5b); and

WHEREAS, Part II.A.1. of the Permits requires the permittee to maintain and operate as efficiently as possible all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with the permit; and

WHEREAS, Section 12-5-29(a) of the Georgia Water Quality Control Act (Act) makes it unlawful to use any waters of the State to dispose of sewage or other wastes, except in such a manner as to conform and comply with the Code and all rules, regulations, orders, and permits established under the Code; and

WHEREAS, Section 12-5-23(c)(12) of the Act provides the Director the authority to issue orders as may be necessary to control, abate, and prevent pollution of the waters of the State; and

WHEREAS, Section 12-5-52(a) of the Act specifies that any person violating the Code or any permit condition or limitation established pursuant to the Code shall be liable to the State of Georgia for a civil penalty not to exceed \$50,000 per day for each day during which such violations continue; and

WHEREAS, the spills and Permit violations addressed in this Order are violations of the Permits, Rules, and Act.

## NOW THEREFORE, the Director ORDERS and the City AGREES as follows:

- 1. Allocate, at a minimum, \$200,000 to complete a Supplemental Environmental Project (SEP). The SEP must go beyond standard compliance requirements and should result in improvement to water quality or water conservation. Any proposed SEP should not be part of a plan or requirement that the City is already in the process of implementing or that is otherwise required in order to comply with the Georgia Water Quality Control Act. Within sixty (60) days of the execution date of this Order, submit to EPD for review and approval a SEP plan and schedule with a completion date no later than December 31, 2016. Once approved by EPD, the SEP plan and schedule will become part of the Order.
- Complete the relocation of the Withlacoochee WPCP in accordance with the construction deadline as described in Action Item 1a and 1b in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the interim plan for meeting permit compliance at the existing Withlacoochee WPCP, submitted to EPD on April 23, 2013.
- 4. Complete Action Item Nos. 2-5 in accordance with the completion deadlines listed in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the revised "Sewer Overflow Response and Reporting Procedures", submitted to EPD via electronic mail on September 11, 2013.
- 6. Submit to EPD semi-annual progress reports for the SEP listed in Condition 1 this Order, and action items listed in Attachment 6 of this Order, by June 30<sup>th</sup> and December 31<sup>st</sup> of each year.

- 7. Consistent with timely review and approval by EPD, all plans, procedures, and schedules required by or referenced in this Order, are upon approval by EPD, incorporated into this Order. The City shall implement all approved plans, procedures, and schedules.
- 8. Upon receipt of any report, plan, or schedule; or any portion of a report, plan, or schedule; or any revised report, plan, or schedule; or any revised portion of a report, plan, or schedule; or any written response (hereinafter collectively "document") required under this Order, EPD shall review said document to determine its completeness with regard to the Act, Permit, and this Order. If EPD determines that said document is complete, EPD shall notify the City in writing that said document is approved. If EPD determines that said document is incomplete, EPD shall provide the City with written notice of any deficiencies. The City shall have sixty (60) days from receipt of the written notice of deficiencies to submit a modified document to EPD unless otherwise specified by EPD. Should the City take exception to all or part of EPD's notice of deficiencies, the City shall, within fifteen (15) days after receipt of the written notice of deficiencies, submit to EPD a written statement of the grounds for the exception. EPD and the City shall confer by telephone or in person in an attempt to resolve any disagreement. If agreement is reached, the resolution shall be written and signed by representatives of each party. If agreement cannot be reached within thirty (30) days from the date of the City's receipt of the notice of deficiencies unless otherwise specified by EPD, the City shall revise the document as required by EPD and resubmit the revised document in accordance with a schedule to be specified by EPD

This Order does not waive EPD's authority to take further enforcement action, or imply

that EPD will not take such action, if the City (1) fails to meet applicable Permit effluent limits, (2) or the City does not fully satisfy the conditions of the Order, or (3) fully comply with other relevant requirements.

This Order is not a finding, adjudication of, or evidence of a violation of any State law by the City nor does the City by its consent agree to any violations of State laws nor admit any liability to any third party or parties.

This Order does not relieve the City of any obligation or requirements of the Permits.

This Order is final and effective immediately, and shall not be appealable, and the City waives any hearing on its term and conditions.

It is so ORDERED, CONSENTED, and	d AGREED TO this day of,
2013.	
FOR THE DIVISION:	
	Judson H. Turner
	Director
FOR THE CITY:	BY (print name): Henry Hicks SIGNATURE: Deluy Sully
	TITLE: Utility Director

DATE: Scholenber 23,2013

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## **ATTACHMENT 1**

Permit Effluent Limitation Violations
Withalcoochee WPCP (GA0033235) and Mud Creek WPCP (GA0020222)
January 2008 to July 2013

## City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

#### Withlacoochee WPCP GA0033235

Parameter	Date F	Permit Limit	Reported Value
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Feb-08	1706	1970
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-08	30	44.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-08	45	141
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-08	1365	2458
Total Suspended Solids Weekly Maximum Loading, kg/Day	Feb-08	1706	7814
Total Suspended Solids Percent Removal	Feb-08	85%	80.8%
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-08	1706	2315
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-08	400	1041
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Aug-08	379	623
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	1137	1311
Dissolved Oxygen Minimum, mg/L	Apr-09	5.0	3.0
Total Suspended Solids Weekly Maximum Concentration, mg/L	Apr-09	45	59.6
Total Suspended Solids Weekly Maximum Loading, kg/Day	Apr-09	1706	3355
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Apr-09	400	58281
Ammonia Weekly Maximum Concentration, mg/L	May-09	6.4	. 7
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Jan-10	<b>853</b>	970
Total Suspended Solids Weekly Maximum Concentration, mg/L	Jan-10	45	62
Total Suspended Solids Weekly Maximum Loading, kg/Day	Jan-10	1706	3396
Ammonia Weekly Maximum Concentration, mg/L	May-10	6.4	15.7
Ammonia Weekly Maximum Loading, kg/Day	May-10	204	366
Ammonia Monthly Average Concentration, mg/L	Aug-11	2.0	2.9
Ammonia Weekly Maximum Concentration, mg/L	Aug-11	3.0	4
Ammonia Weekly Maximum Loading, kg/Day	Aug-11	76.0	80,1
Ammonia Weekly Maximum Concentration, mg/L	Sep-11	3.0	3.6
Ammonia Weekly Maximum Concentration, mg/L	Jul-12	3.0	3.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Sep-12	4.0	4.4
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Sep-12	6.0	8.3
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Sep-12	152	180.3
Ammonia Weekly Maximum Concentration, mg/L	Sep-12	3.0	3.5
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Sep-12	400	457.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Oct-12	. 4.0	4.5
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Oct-12	6.0	8.7
Ammonia Weekly Maximum Concentration, mg/L	Oct-12	3.0	5.8
Ammonia Weekly Maximum Loading, kg/Day	Oct-12	76	86.6

## City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

#### Withlacoochee WPCP GA0033235, cont.

<u>Parameter</u>	<u>Date</u> <u>Per</u>	mit Limit	Reported Value
pH Minimum, S.U.	Jan-13	6.0	4.5
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-13	30	67.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-13	45	98.3
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-13	1365	2476.0
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Mar-13	1706	3542.6
Total Suspended Solids Weekly Maximum Concentration, mg/L	Mar-13	45	149.4
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-13	1706	14624
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-13	400	35283

#### Mud Creek WPCP GA0020222

Parameter Total Suspended Solids Weekly Maximum Loading, kg/Day	<u>Date</u> <u>F</u> Aug-08	Permit Limit 458	Reported Value 654
Effluent Flow Monthly Average, MGD	Jan-10	3.22	3.23
Effluent Flow Monthly Average, MGD	Mar-10	3.22	3.3
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Oct-10	400	1158
Ammonia Monthly Average Concentration, mg/L Ammonia Weekly Maximum Concentration, mg/L Ammonia Monthly Average Loading, kg/Day Ammonia Weekly Maximum Loading, kg/Day	Nov-10 Nov-10 Nov-10 Nov-10	1.5 2.25 18 23	
Effluent Flow Monthly Average, MGD	Feb-11	3.22	3.3
Effluent Flow Monthly Average, MGD	Mar-11	3.22	. 3.3
Effluent Flow Monthly Average, MGD Effluent Flow Weekly Maximum, MGD	Mar-12 Mar-12	3.22 4.03	3.3 4.8
Effluent Flow Monthly Average, MGD Effluent Flow Weekly Maximum, MGD	Mar-13 Mar-13	3.22 4.03	3.3 6.2
Effluent Flow Monthly Average, MGD	Jul-13	3.22	3.4

City of Valdosta

ATTACHMENT 2
City of Valdosta Raw Sewage Spills January 1, 2008 to July 31, 2013

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
	TRIBUTARY TO JOREE MILL POND	-		HEAVY RAIN, PRESSURE ALSO CAUSED FAILURE TO
2008-02-21	TO TWO MILE BRANCH	817 GORNTO ROAD	6,000	PREVIOUS SEWER REPAIR
# ************************************	STILLHOUSE BRANCH TRIB TO	No.	,	
2008-02-21	-{	3500 COUNTY CLUB ROAD	6,000	HEAVY RAINFALL
	DUKES BAY CANAL TRIBUTARY TO		-	
2008-02-21	MUD CREEK	108 TUCKER ROAD	18,000	HEAVY RAINFALL
2008-02-21	KNIGHTS CREEK	1001 PONDEROSA DRIVE	22,000	HEAVY RAINFALL
2008-02-22	TWO MILE BRANCH	608 HOWELL BROOK DRIVE	35,000	OVERLOAD DURING HEAVY RAIN
2008-08-23	KNIGHTS CREEK	1001 PONDEROSA DRIVE	24,000	INFLOW
2008-11-30	WITHLACOOCHEE RIVER	HIGHWAY 133 @ I-75 EXIT 18	135,000	HEAVY RAINFALL
2009-02-19	TRIBUTARY TO CHERRY CREEK	LAKE LAURIE DRIVE	500	SANITARY OVERFLOW/ ELECTRICAL PUMP FAILURE
2009-04-03	SUGAR CREEK	2408 MEADOWBROOK DRIVE	10,001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2310 PARK LANE	10,001	EXCESSIVE RAIN
2009-04-03	ONE MILE BRANCH	1212 WAINWRIGHT DRIVE @ OLD SUGAR CREEK WWTP	10,001	EXCESSIVE RAIN
2009-08-13	SUGAR CREEK	1314 BAYTREE ROAD	18,900	MANHOLE FALLEN INTO STREAM
2009-08-18	UNNAMED TRIBUTARY	KINDERLOU LIFT STATION	5,500	ELECTRICAL- DUE TO SCADA FAILURE
2009-08-26	DUKES BAY CANAL	210 DAMPIER STREET	3,000	GREASE BLOCKAGE
2009-11-11	SUGAR GREEK	1825 NORMAN DRIVE	14,000	BLOCKAGE OF GREASE AND RAGS
2009-11-18	ONE MILE BRANCH	1409 NORTH ASHLEY STREET	7,500	STORM WATER PIPE BROKE SEWER LINE

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED/CAUSE
2009-12-02	TWO MILE BRANCH	2408 NORTH PATTERSON	9,000	GREASE BLOCKAGE
2009-12-02	SUGAR CREEK	1825 NORMAN DRIVE	6,000	BLOCKAGE IN SEWER MAIN
2009-12-03	SUGAR CREEK	1815 NORMAN DRIVE	9,999	BLOCKAGE AND EXCESSIVE RAIN
2009-12-08	MUD CREEK	MUD CREEK WWTP	550,000	COLLAPSED MANHOLE
2009-12-09	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/EXCESSIVE RAIN/CLOGGED PUMPS
2009-12-10	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/HEAVY RAINS/CLOGGED PUMPS
2009-12-11	MUD CREEK	MUD CREEK WWTP	1,350,000	DAMAGED MANHOLES
2009-12-12	MUD CREEK	MUD CREEK WWTP	950,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-13	MUD CREEK	MUD CREEK WWTP	350,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-22	SUGAR CREEK	1825 NORMAN DRIVE	14,000	GREASE AND RAGS
2010-01-21	TRIBUTARY TO KNIGHTS CREEK	1001 PONDEROSA DRIVE	12,100	INFLOW AND INFILTRATION (I&I), HEAVY RAIN
2010-01-21	DUKES BAY	700 ROGERS STREET	600	I&I, HEAVY RAIN
2010-01-21	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	138,000	I&I, HEAVY RAIN
2010-01-21	TRIBUTARY TO AN UNNAMED STREAM	700 CYPRESS STREET	64,000	I&I, HEAVY RAIN
2010-01-21	SUGAR CREEK	2408 MEADOWBROOK DRIVE	450,000	I&I, HEAVY RAIN
2010-01-21	DUKES BAY	400 SOUTH OAK STREET	6,000	I&I, HEAVY RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-01-21	TRIBUTARY TO TWO MILE BRANCH	817 GORNTO ROAD	20,350	I&I, HEAVY RAINS
2010-01-25	DUKES BAY CANAL	701 CYPRESS STREET	34,000	MANHOLE COLLAPSED
2010-04-04	TWO MILE BRANCH	2408 NORTH PATTERSON STREET	4,000	GREASE BLOCKAGE
2010-04-18	TRIBUTARY TO KNIGHTS CREEK	1201 PONDEROSA DRIVE	500	GREASE BLOCKAGE
2010-04-29	DUKES BAY CANAL	TUCKER ROAD	3,000	LINE BLOCKAGE
2010-06-14	DUKES BAY CANAL	613 SOUTH PATTERSON STREET	3,240	BROKEN PIPE .
2010-09-27	ONE MILE BRANCH	212 EAST COLLEGE STREET	1,100	1&1
2010-09-29	SUGAR CREEK	1423 GORNTO ROAD	75,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TRIBUTARY TO KNIGHTS CREEK	1003 PONDEROSA DRIVE	27,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	ONE MILE BRANCH	212 EAST COLLEGE STREET	6,000	I&I DUE TO EXCESSIVE RAIN
2011-01-18	TRIBUTARY TO CHERRY CREEK	4036 BEMISS ROAD	27,000	GREASE BLOCKAGE
2011-02-07	THREE MILE BRANCH	825 NORTHWOOD PARK DRIVE	187,660	COLLAPSED SEWER
2011-10-12	TWO MILE BRANCH	2501 NORTH PATTERSON STREET @ PENDLETON DRIVE	500	GREASE BLOCKAGE
2011-10-13	TRIBUTARY TO LAKE SHERI	1307 NORTH SAINT AUGUSTINE ROAD	4,600	RAG BLOCKAGE

BEGIN DATE	WATERWAY IMPACTED*	OVERFLØW LOCATION	QUANTITY	REPORTED CAUSE
2011-11-29	SPRINGHOUSE CREEK	3350 PLANTATION DRIVE	9,000	BYPASS PUMP HOSE CONNECTION FAILURE
2012-03-03	CHERRY CREEK	4119 BEMISS ROAD BEMISS ROAD PUMP STATION	24,000	PUMP STATION OVERLOADED BY HEAVY RAINS
2012-03-03	SUGAR CREEK	2412 MEADOWBROOK DRIVE	12,000	HYDRAULIC OVERLOAD
2012-03-08	TRIBUTARY TO KNIGHTS CREEK	301 SOUTH BLANCHARD STREET	189,000	COLLAPSED SEWER MAIN
2012-06-05	TWO MILE BRANCH	NORTH ASHLEY STREET	1,800	SEWER BROKEN BY CONTRACTOR
2012-06-26	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,000	EXCESSIVE RAIN FROM TROPICAL STORM DEBBY
2012-07-11	SUGAR CREEK	2412 MEADOWBROOK DRIVE	. 1,000	EXCESSIVE RAIN .
2012-08-07	CHERRY CREEK	4119 BEMISS ROAD	1,000	LEAKING PUMP
2012-08-16	WITHLACOOCHEE RIVER	EXIT 18 @ HIGHWAY 133	2,500,000	PUMP STATION FAILURE
2012-08-16	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,500,000	BOTH PUMPS AT PUMP STATION FAILED
2013-02-21	KNIGHTS CREEK	3891 INNER PERIMETER ROAD	20,000	GREASE BLOCKAGE
2013-02-25	CHERRY CREEK	4119 BEMISS ROAD	173,000	HYDRAULIC OVERLOAD
2013-02-25	SUGAR CREEK	626 SCOTT DRIVE	720,000	EXCESSIVE RAIN
2013-02-25	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,290,000	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	ROUSE ROAD	590,500	EXCESSIVE RAIN
2013-02-25	TWO MILE BRANCH	2420 MEADOWBROOK DRIVE	936,000	EXCESSIVE RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2013-02-25	TWO MILE BRANCH	817 GORNTO ROAD	53,750	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	1248 NORTH LEE STREET	19,200	EXCESSIVE RAIN
2013-02-25	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST	124,500	EXCESSIVE RAIN
2013-02-26	ONE MILE BRANCH	JOREE STREET	29,000	EXCESSIVE RAIN
2013-02-28	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,750,000	I&I, FLOODING FROM RAIN
2013-03-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	I&I, EXCESSIVE RAIN
2013-03-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	EXCESSIVE RAIN
2013-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,400,000	EXCESSIVE RAIN
2013-03-04	DUKES BAY CANAL	1810 SOUTH PATTERSON STREET	100,000	RUPTURED SEWER MAIN
2013-03-24	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST OF WITHLACOOCHEE RIVER BRIDGE	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1423 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	2412 MEADOWBROOK DRIVE	360,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	626 SCOTT DRIVE	300,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1404 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-07-22	TWO MILE BRANCH	2400 NORTH PATTERSON STREET	2,050	GREASE
2013-07-31	SUGAR CREEK	2400 MEADOWBROOK DRIVE	2,000	POSSIBLE BLOCKAGE, UNDER INVESTIGATION

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY REPORTED CAUSE
	- I service and the service an	, the state of the	
2013-07-31	HIGHTOWER CREEK	600 SCOTT DRIVE	2,000 POSSIBLE BLOCKAGE

City of Valdosta

#### **ATTACHMENT 3**

EPD Fish Kill Investigations
November 20, 2009 and February 22, 2013

Fish Kill Investigation: One Mile Branch In Lowndes County, Georgia On November 20, 2009

> By Jeremy Wixson

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region
Fitzgerald, Georgia

November 24, 2009

On Thursday November 19, 2009 at 3:45 p.m., Bill Noelle (404-362-2624) of Georgia EPD telephoned the Bowen's Mill Office to notify us of a fish kill in the city of Valdosta in Lowndes County Georgia. Marty Snowden took the call and linked me in the field to let me know. I was planning to sample fish that night and was not able to get to Valdosta before dark. I telephoned Bill Noelle and left a message for him on Friday November 20, 2009. I then telephoned John Waite (229-292-0842 cell, jwaite@valdostacity.com), Environmental Manager with the City of Valdosta. John informed me that there had been a break in a wastewater line that occurred in the Coca-Cola Bottling Plant parking lot. The leak was first discovered by a work detail cleaning One Mile Branch. The City dispatched utility crews to determine the cause and make repairs to the line. It was an 8-inch vitrified clay pipe and the water in it was coming from businesses in the area including a large laundromat. They discovered the broken pipe on Wednesday November 18, 2009. To fix the pipe, they dammed up One Mile Branch just below the site the wastewater was entering the branch, and used a gasoline pump to pump the water back into the sewage system. They estimated that approximately 7,500 gallons was discharged to the Branch before they got the pump in place. On Thursday November 19, 2009, Utility Department staff was checking the Branch downstream of the break and noticed some dead fish in One Mile Branch. They called EPD, who in turn called us. Bill Noelle indicated that EPD staff would be investigating on November 20, 2009 as well.

Edward Zmarzly and Jeremy Wixson went to the location of the fish kill on November 20<sup>th</sup> and took water quality measurements at the North Lee Street crossing (Figure 1, WQ station 1) at 1230 hours, at the break site (Figure 1, WQ station 2) at 1244 hours, and at the Williams Street Crossing (Figure 1, WQ station 3) at 1348 hours. Water was flowing slowly in the branch, and in all locations live fish were observed. We then went to the site of the broken sewer line and began counting the fish observed according to species and size, working our way downstream until we no longer observed dead fish. The kill area was spread out from the location of the broken sewer line (Figure 1, purple marker by WQ station 2) to 0.69 miles downstream on the Valdosta State University Campus (Figure 1, purple marker between WQ stations 3 and 4). When we finished taking inventory of the dead fish, we went downstream to take a final set of water quality readings at the West Gordon Street Crossing (Figure 1, WQ station 4) at 1610 hours. We were unable to determine if the fish kill was a direct result of the broken pipe's effluent or from installation of a temporary dam used to catch the effluent.

We measured basic water quality with a YSI model 550 oxygen meter and a Hach portable water test kit model FF-1 (Table 1). Dissolved oxygen was lowest at the WQ station 1, which was a little shallower and slower moving than the other stations. The pH was highest at the location of the sewage line break (WQ station 2), but had become more neutral by the time it reached WQ station 3.

In total we found 510 dead fish with a total value of \$186.45 (Table 2), there was one crayfish also dead in the area. The cost of investigating the fish kill (Table 3) was \$1,215.99. The total value of the fish kill including the cost of investigation and the value of the fish killed was \$1,402.44.



Figure 1. Map of One Mile Branch area of fish kill investigation.

Table 1. Water quality measurements made during the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Station Number and Location	Time (hrs)	Depth (ft)	Temperature (°C)	DO (ppm)	pН	Hardness (ppm)	Alkalinity (ppm)	Dead Fish
1. N Lee Street 30.84862° N 83.27824° W	1230	Surface	16.1	3.3	7	48	12	NO
2. Marion Street 30.84755° N 83.27940° W	1244	Surface	21.7	5.5	9	60	24	YES
3. Williams Street 30.84748° N 83.28365° W	1348	Surface	16.3	4.2	6.5	44	24	YES
4 W Gordon Street 30.84041° N 83.30654° W	1610	Surface	17.5	8.15	6.5	36	24	NO

Table 2. Number and monetary value of dead fish from the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Species	Number of Dead Fish	Value (in dollars) <sup>a</sup>
American Eel	1 ·	2.37
Anguilla rostrata		
Golden Shiner	35	7.75
Notemigonus crysoleucas		
Bullhead Catfish	. 62	68.56
Ameiurus spp.		
Mosquitofish	196	25.48
Gambusia spp.	•	
Bluegill	156	54.55
Lepomis macrochirus	1	
Redbreast Sunfish	59	27.44
Lepomis auritus		,
Spotted Sunfish	1	0.30
Lepomis punctatus		•
Total	510	186.45

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

Table 3. Costs for the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Item	Amount	Cost (\$)
Personnel a		
PS: Nat Res Biologists (WL)	20 hours	584.00
TS: Natural Resources Tech (AL)	21 hours	506.94
Vehicles	•	
129772	191 miles	105.05
Other		
Supplies	1 set	20.00
Total		\$1215.99

<sup>&</sup>lt;sup>a</sup>Cost includes fringe benefits

### REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water	ngitude)	MAJOR RIVER		R RIVER BASIN				
One Mile Branch (Tributary to Withlacoochee River) 30.84755					.27940° W	Suw	annee	
NEAREST TOWN					COUNTY DA		ATE OF KILL	
Valdosta				Lowr	ndes Nov		ember 18, 2009	
TYPE OF WATER BODY	:			DURATION OF KILL (If known)				
☐ RIVER OR STREAM ☐	LAKE/POND		ESTUARY	DAYS/H	ours Severa	l hour	'S	
P	OLLUTI	ON S	OURCE - TY	PE O	F OPERATION	NC		
AGRICULTURAL OPERATION	ONS		INDUSTRI	AL OPER	ATIONS		MUNICIPAL OPERATIONS	
☐ POISONS (pesticides) ☐ MININ ☐ FERTILIZERS ☐ FOOD ☐ MANURE DRAINAGE, ENSILAGE ☐ META ☐ LIQUORS, OR FEED LOT OPERATIONS ☐ RUBE ☐ HANDLING OF EQUIPMENT AND ☐ CHEN			DD & KINDRED TALS BBER & PLASTICS EMICALS TROLEUM	G TEXTILES  & KINDRED LEATHER & LEATHER  LS PRODUCTS  LER & PLASTICS PAPER & ALLIED  IICALS PRODUCTS  OLEUM LUMBER & WOOD			SEWERAGE SYSTEMS  □ REFUSE DISPOSAL  □ WATER SYSTEM □ SWIMMING POOL □ POWER SYSTEM □ PEST CONTROL □ OTHER	
TRANSPORTATION OPERAT	rions			OTHER				
☐ RAIL ☐ TRUCK ☐ BARGE ☐ AIR ☐ PIPELINE ☐ OTHER			NGEMENT/ENTRAINS	MENT/DAM DESIGN			□ UNKNOWN	
SPECIFIC POLL	UTANT (	OR F	ACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC	
☐ NUTRIENTS ☐ RADIONUCLEIDES ☐ TEMPERATURE ☐ CYANIDES AND PHENOLS	SEDIME	EUM (OIL	. & GREASE)	☐ PE:	YGEN DEFICIENCY STICIDES, HERBICID (ED CHEMICALS HER (specify):	ES, ETC	☐ pH ☐ TURBIDITY ☑ UNKNOWN	
EXTENT OF AREA AF	FECTED		ESTIMATED OR A	CTUAL			KILLED (If known)	
MILES OF STREAM 0.69					American Eel, Golden Shiner, Bullhead spp., Mosquitofish, Blueg Redbreast Sunfish, Spotted Sunfish			
SEVERITY			VALUE OF FISH K	ILLED				
☐ TOTAL ☐ HEAVY ☐ M	☐ TOTAL ☐ HEAVY ☐ MOD ☑LIGHT \$186.45					<u> </u>		
ADDITIONAL REMARKS (include effects on other than fish, e.g., shellfish, waterfowl, etc.) Saw one dead Crayfish.								
INVESTIGATOR MAILING ADDRESS AND PHO					UMBER		DATE OF REPORT	
Jeremy Wixson 1773A Bowens Mill Highwa Fitzgerald, GA 31750 229-426-5272							November 24, 2009	
EPD FOLLOW-UP INVESTIGATION	EPD FOLLOW-UP INVESTIGATION REFERRED TO: ACTIONS TAKEN (I						WQMU (EPD)	



#### WILDLIFE RESOURCES DIVISION

MARK WILLIAMS COMMISSIONER

DAN FORSTER DIRECTOR

March 11, 2013

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RECEIVED

#### **MEMORANDUM**

TO:

Jane Hendricks

EPD - Wastewater Regulatory Program

Marzieh Shahbazaz

EPD - Permitting, Compliance, and Enforcement

FROM:

Matt Thomas

Assistant Chief of Fisheries

SUBJECT:

Fish Kill - Knights Creek

Lowndes County, Georgia

February 22, 2013

Attached is copy of subject fish kill investigation report for your files. Please call me if you have questions.

:mt

cc: John Biagi Bert Deener

Attachment

#### Fish Kill Investigation in Knights Creek In Lowndes County, Georgia February 22, 2013

by Bryant Bowen

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region IV
Waycross, Georgia

Chad Sexton received notification of a fish kill in Knights Creek, Lowndes County on February 22, 2013 around 0945 hours from John Waite (229.292.0842) of Valdosta Water and Sewerage Department resulting from a sewage spill. The spill reportedly started around 2130 hours on February 20, 2013. The city located the spill at 1030 hours February 21, 2013 near the Chadwyck subdivision and repaired the overflowing manhole around 1430 hours. Mr. Waite reported an estimated 20,000 gallons of sewage spilled. Mr. Waite also reported that the department flushed the canal, with treated water, overnight using a nearby fire hydrant. Valdosta Water and Sewerage Department personnel picked up and iced around 30 dead fish on February 21, 2013. After receiving all pertinent information from Mr. Waite and gathering necessary equipment and additional staff, Jason Mitchell and Chad left Waycross to investigate.

Chad and Jason arrived at 1230 hours at the intersection of Inner Perimeter Road and Tyndall Dr. near the origin of the spill (Fig. 1). At this point, it started raining and continued to rain throughout the investigation. Mr. Waite met Chad and Jason around 1315 hours at Site #1 (Fig. 1) and reported that EPD had already been contacted. He relayed the spill history and actions taken by his department and handed over the previously collected dead fish. Based on Mr. Waite's information, there was nowhere to take water quality above or near the spill origin, which was a clogged manhole that overflowed municipal sewage into a ditch with little water in it. Here they encountered the remnants of the spill: the smell of raw sewage and visual debris. They measured basic water quality at all of the rest of the sites using a YSI model 85 oxygen/conductivity meter, a Hach portable water test kit model FF-1, and a YSI model 60 pH meter. They noted that the total hardness and specific conductance readings were elevated at the first site and dropped as they moved downstream. At the time of the investigation, none of the water quality readings were at levels typically capable of killing fish. Water temperatures dropped as they moved downstream, likely because of the heavy rainfall.

Jason and Chad counted and/or collected every visible dead fish between the spill origin and Site #2 (Jaycee Shack Road) but were unable to collect dead fish between Sites #2 and #3 due to lack of access, deeper water, and an impenetrable understory. Therefore, the number of dead fish was estimated using an expansion factor. The expansion factor was determined by dividing the total number of segments by the number of segments in which fish were collected. In this case, we had 5 total segments and were able to collect fish from 2 of those. This provided us with an expansion factor of 2.5.

They observed no live fish at any of the 3 sites, mainly because of the reduced visibility caused by the heavy rainfall. The water quality at the last site had improved and no dead aquatic organisms were detected within 200 ft. upstream of Park Avenue. Therefore we determined this was the terminus of the 1.58 mile long fish kill. It was at this point that the field investigation ended. Due to heavy rainfall, Chad and Jason returned to the Waycross Regional Fisheries Management Office to work up all collected dead fishes with Bert Deener.

The initial cause of the fish kill appears to be an oxygen depletion caused by overloading of nutrients from raw sewage into Knights Creek. The system was also flushed with treated city drinking water from a fire hydrant. The total estimated number of fish killed was 469, and the value of these fish was \$219.59 (Table 2). Additionally, 17 crayfish and 16 bullfrog tadpoles were killed. The cost of the investigation was \$845.36 (Table 3). The total cost of the dead fish and the investigation was \$1064.95.

#### REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water: Latitude-Longitude)						MAJOR	MAJOR RIVER BASIN		
Knights Creek				·		Alapaha / Suwanee			
NEAREST TOWN				COUNTY		DATE OF KILL			
Valdosta				Lowndes		2/20 – 2/21/2013			
TYPE OF WATER BODY				DURAT	ION OF KILL (If know	/n)			
☐ RIVER OR STREAM ☐ L	AKE/POND		ESTUARY	DAYS/HOURS ~ 18 hrs.					
Р	OLLUT	ION S	OURCE - TY	PE O	F OPERATION	NC	ſ		
AGRICULTURAL OPERATION	NS		INDUSTRI	AL OPER	ATIONS		MUNICIPAL OPERATIONS		
☐ MANURE DRAINAGE, ENSILAGE PROI LIQUORS, OR FEED LOT OPERATIONS ☐ META ☐ HANDLING OF EQUIPMENT AND ☐ RUBE CONDITIONS ☐ CHEM			OD & KINDRED ODUCTS	☐ TEXTILES ☐ LEATHER & LEATHER PRODUCTS ☐ PAPER & ALLIED PRODUCTS ☐ LUMBER & WOOD PRODUCTS ☐ SAND & GRAVEL			☐ SEWERAGE SYSTEMS ☐ REFUSE DISPOSAL ☐ WATER SYSTEM ☐ SWIMMING POOL ☐ POWER SYSTEM ☐ PEST CONTROL ☐ OTHER		
TRANSPORTATION OPERAT	IONS			OTHER	-				
☐ RAIL ☐ TRUCK ☐ BARGE ☐ AIR ☐ PIPELINE ☐ OTHER	OR BOAT		NGEMENT/ENTRAIN	MENT/DAM DESIGN ☐ OTHER			□ ∩NKNOMN		
SPECIFIC POLL	UTANT	OR F	ACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC		
☐ NUTRIENTS ☐ RADIONUCLEIDES ☐ TEMPERATURE ☐ CYANIDES AND PHENOLS	SEDIME	LEUM (OIL	L & GREASE)	□ PE: □ MIX ☑ OTI	GEN DEFICIENCY STICIDES, HERBICID (ED CHEMICALS HER (specify): Poss vith city water and/or	ible chlo	UNKNOWN Ine poisoning from flushing		
EXTENT OF AREA AF	FECTED		ESTIMATED OR A	CTUAL	SPECIES	OF FISH	KiLLED (if known)		
MILES OF STREAM 1.58 mi	ACRES OF	LAKE	469		Lake chubsucker, Warmouth, Spotte sunfish, Largemouth bass, Redfin				
SEVERITY VALUE OF FISH I			VALUE OF FISH K				erel, Redbreast Inidentified sunfish, Iespotted sunfish, pminnow, Swamp		
ADDITIONAL REMARKS (Include effects on other than fish, e.g., shellfish, waterfowl, etc.)  The spill killed other aquatic organisms besides fishes including: 17 Crayfish, 16 Tadpoles,									
INVESTIGATOR INVESTIGATOR MAILING ADDRESS AN P.O. Box 2089 Chad Sexton Jason Mitchell Waycross, GA 31502 (912)285-6094							DATE OF REPORT 2/26/2013		
EPD FOLLOW-UP INVESTIGATION REFERRED TO: ACTIONS TAKEN (I					PD)		WQMU (EPD)		

Figure 1. Map of study area for the fish kill investigation on Knights Creek in Valdosta, Lowndes County, GA on February 20-22, 2013.



	Legend	
Spill Origin	30°52'58.91"N	83°15'29.50"W
Site # 1 (Pump Station)	30°52'46.42"N	83°15'22.86"W
Site #2 (Jaycee Shack)	30°52'33.77"N	83°15'8.27"W
Site #3 (Park Avenue)	30°51'40.78"N	83°15'16.42"W

Figure 2. Photo of manhole that was the spill origin (photo taken on February 22, 2013).



Figure 3. First road culvert holding water near spill origin (taken on February 22, 2013).

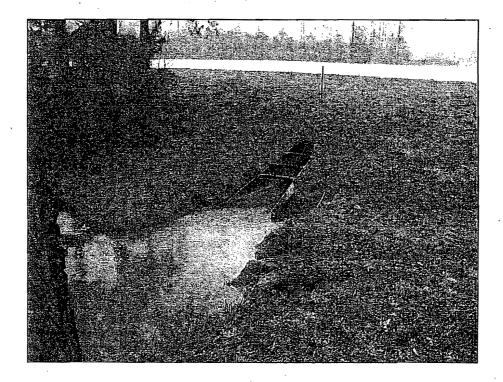


Table 1. Water quality measurements made during the fish kill investigation on Knights Creek in Lowndes County February 22, 2013 including GPS coordinates.

Station name or location	Time (hrs)	Water depth (ft)	Water Temp (°C)	D.O. (ppm)	pН	Total hardness (ppm)	Total alkalinity (ppm)	Specific conductance (µs)	Dead fish	GPS coordinates
Site # 1 (Pump Station)	1350	Surface	18.5	5.6	6.2	154	68	306	Yes	30°52'46.42"N 83°15'22.86"W
Site #2 (Jaycee Shack) Road	1430	Surface	16.4	6.1	6.1	68	34	252	Yes	30°52'33.77"N 83°15'8.27"W
Site # 3 (Park Avenue)	1536	Surface	15.4	7.01	6.1	68	68	91	No	30°51'40.78"N 83°15'16.42"W

Table 2. Number and monetary value of dead fish from the fish kill investigation in Knights Creek, Lowndes County, on February 20 - 22, 2013.

Species	Number of dead fish b	Value (\$) a/b		
Lake chubsucker	26			
Erimyzon sucetta	20	21.85		
Flat bullhead	33	25.00		
Ameiurus platycephalus	33	23.00		
Western mosquitofish	. 8	1.04		
Gambusia affinis	o	1.04		
Redbreast sunfish	225	75.75		
Lepomis auritus		75.75		
Warmouth	40	16.23		
Lepomis gulosus	40	10.23		
Bluegill	10	3,15		
Lepomis macrochirus		3,13		
Spotted sunfish	68	21.36		
Lepomis punctatus	00	21.50		
Largemouth bass	15	24.58		
Micropterus salmoides	13	<i>D</i> 1130		
Redfin pickerel	10	15.97		
Esox americanus	•	~~~~		
Chain pickerel	3	4.29		
Esox niger				
Goldfish	5	2.05		
Carrassius auratus auratus		•		
Bluespotted sunfish	3	0.01		
Enneacanthus gloriosus	· 3	0.81		
Lined topminnow	5	`		
Fundulus lineolatus	5	0.54		
Swamp darter	. 10	4.00		
Etĥeostoma fusiforme	10	4.22		
Brook silverside	2	^ 7£		
Labidesthes sicculus	3	0.75		
Unidentified sunfish	O	2.00		
	8	2.00		
Total	469	\$219.59		

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

b Expanded value = number counted multiplied by an expansion factor.

The expansion factor = total number of segments/number of segments sampled = 5/2 = 2.5

Table 3. Costs for the fish kill investigation on the Knights Creek in Lowndes County from February 20-22, 2013.

Item	Amount	Cost (\$)	
Personnel a			
Fisheries Biologist I	8 hours	\$233.53	
Fisheries Technician III	12 hours	\$314.04	
Fisheries Technician II	8.5 hours	\$194.57	
Regional Supervisor	1 hour	\$38.22	
Vehicles			
129823	130 miles	\$65.00	
Total		<b>'</b> \$845.36	

<sup>&</sup>lt;sup>a</sup> Values include fringe benefits.

City of Valdosta

#### **ATTACHMENT 4**

City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1)
January 1, 2008 to July 31, 2013

## City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
				STATE OF THE STATE
2008-01-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,473,000	HYDRAULIC OVERLOAD, CAUSED BY RAIN
				HEAVY RAIN, INFLOW AND INFILTARION (I/I) DURING WEEK
2008-02-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE		OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
5 + 2	 			HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,500,000	5" on 2/21 and 2" on 2/22
				HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE		5" on 2/21 and 2" on 2/22
				HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE		5" on 2/21 and 2" on 2/22
CONTRACT OF THE CONTRACT OF TH				HEAVY RAIN CAUSED HIGH PEAK FLOW LEADING TO
2008-04-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,600,000	HYDRAULIC OVERLOAD OF SECONDARY CLARIFIERS
1. Table 1.				. '\
2008-08-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,200,000	HYDRAULIC OVERLOAD
2008-08-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16,900,000	HYDRAULIC OVERLOAD
2008-08-26	MUD CREEK	1638 NEW STATENVILLE ROAD	6,300,000	HYDRAULIC OVERLOAD FROM TROPICAL STORM FAY
2008-11-29	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,500,000	I&I, HEAVY RAINFALL
2009-01-27	MUD CREEK	1638 NEW STATENVILLE ROAD	2,700,000	CLOGGED ACTIVATED SLUDGE TUBES
2009-03-31	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,800,000	HIGH SOLIDS IN EFFLUENT FLOW AND EXCESSIVE RAIN
2009-04-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	18,300,000	EXCESSIVE RAIN
2009-04-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	24,800,000	FLOODING
2010-01-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,400,000	I&I, HEAVY RAIN
2010-01-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	14,900,000	INFLOW FROM HEAVY RAIN

## City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,000,000	INFLOW FROM HEAVY RAIN
2010-03-11	WITHLACOOCHEE RIVER .	3352 WETHERINGTON LANE	12,200,000	INFLOW FROM HEAVY RAIN
2010-04-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	5,900,000	BIOLOGICAL UPSET OF SECONDARY TREATMENT SYSTEM
2011-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,100,000	RAIN INDUCED, HYDRAULIC PROBLEM AT PLANT
2011-02-10	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,300,000	HYDRAULIC OVERLOAD
2011-02-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,825,000	MECHANICAL FAILURE
2012-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,380,000	HYDRAULIC OVERLOAD OF WPCP SECONDARY SYSTEM
2013-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,047,000	HYDRAULIC OVERLOAD
2013-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	11,673,000	HYDRAULIC OVERLOAD
2013-02-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,173,000	EXCESSIVE RAIN
2013-07-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,600,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-24	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,950,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,500,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07 <b>-2</b> 6	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,000,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-30	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,200,000	HYDRAULIC OVERLOAD, EXCESSIVE RAIN

City of Valdosta

#### **ATTACHMENT 5a**

EPA Comments on the City of Valdosta's Sewer Overflow Response and Reporting Procedures
April 11, 2013

EPA Comments on Sewer Overflow Response and Reporting Procedures:

City of Valdosta – Response to 10/23/2012 Section 308 Request (Attachments E and F)

#### Standard Operating Procedure (Attachment E)

- 1. Section II.A.1. If the crew confirms an overflow is occurring, then the start time recorded should be the initial time reported, or earlier if there is credible testimony, and not the time that the overflow was discovered by the crew. This should also be reflected in the process diagram.
- 2. Section II.A.5. Additional instruction concerning the perspective(s) and settings for the photographs is likely needed to ensure photos are taken that are of use in making estimations.
- 3. Section II.A.6. Additional instruction concerning procedure for measurements is likely needed to ensure measurements are obtained accurately.
- 4. Section II.A.9. Identification of the name of the waters is also necessary for reporting purposes.
- 5. Section II.B.2. Additional instruction concerning how to document causal observations is likely needed to ensure the information collected has consistent specificity.
- 6. Section III.D. Washing down the area after application of the disinfectant could still result in pollutants to the storm drain. Quarantining and collecting the wash water, or instructing that no wash water is to be directed or drained to the storm drain may be a prudent addition.
- 7. Section IV. Direction regarding how to respond and communicate back-ups to basements or homes due to the sewer overflow conditions is needed.
- 8. Section IV. Direction regarding how to record and communicate sewer overflows that do not reach waters of the state is needed.
- 9. Process diagram. Start time of overflow should be specified as noted above. More than one picture may be taken.

#### Methods of Estimation

The two page document (Attachment F) offers insufficient instruction for performing the estimations of discharge. Valdosta needs to formalize its techniques and attach instruction to the standard operating procedure.

City of Valdosta

#### **ATTACHMENT 5b**

The City of Valdosta's Revised Sewer Overflow Response and Reporting Procedures
September 11, 2013

### Standard Operating Procedure Sanitary Sewer Overflow Response and Reporting

The purpose of this document is to establish a standard procedure for responding to and reporting sanitary sewer overflows from the City of Valdosta collection system. All sanitary sewer overflows require immediate response to stop the overflow and secure the affected area to protect public health. All overflows must be investigated to determine the cause and any contributing factors. Finally, all overflows must be documented to fulfill regulatory requirements and to provide information for future collection system improvements and repairs. Any sanitary overflow that allows untreated wastewater to enter waters of the state must be reported to the Environmental Protection Division (EPD), to the local media, and to the health department as required under the Georgia Rules for Water Quality Control section 391-3-6-.05 Emergency Actions.

#### I. Definitions:

#### "Major Spill" means:

- 1. The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit for biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids.
- 2. Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water quality violations in the waters of the State.

"Spill" means any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to waters of the state.

"Waters of the State" means any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation. (O.C.G.A. 12-5-22)

#### II. Identification of sanitary sewer overflow:

A. When a report of an overflow is received a utilities department crew must be dispatched to confirm that an overflow does exist. If the report is received after normal working hours the standby crew must respond. Upon locating and confirming the overflow the responders must follow procedures to document the overflow and aid in determining the extent of the overflow. Supervisors responding to the overflow will be able to help collect information and will make sure that all needed information is gathered.

- 1. Record the date and time the overflow began. This will be the time the initial report was received, or earlier if there is credible testimony to support the earlier time.
- 2. Report the overflow to the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager.
- 3. Advise the Collections Supervisor or standby supervisor of conditions and what equipment may be needed to stop the overflow
- 4. Check downstream manholes to determine if there is a blockage and to identify the approximate position of any blockage.
- 5. Document the overflow with pictures before removing the manhole cover, these pictures will be used to help estimate the rate of flow. When taking pictures of the overflow:
  - a. Use a digital camera on automatic settings
  - b. The camera must be set to the correct date and time, the date stamp option must be on so that the date will appear on the picture
  - c. Take at least one picture from the side of the manhole with a ruler in place to display the height of the sewage coming from the vents or around the manhole frame. If there are multiple vents discharging then more than one picture should be taken measuring the height of flow at different locations along the arc of the manhole cover.
  - d. Take one picture from above the manhole lid to document the number of vents releasing sewage or the percentage of the frame involved in the overflow.
  - e. Takes pictures of the sewage stream leaving the manhole, any ponds or pools of sewage for documentation. The size of these pools will be measured to estimate the volume in the pool.
- 6. Document information necessary to help determine the volume of the overflow. Since the conditions at each overflow will be different, there is no single method of determining total volume of sewage discharged that will be appropriate for all events. One or more of the following methods will be used. Appendix 1 contains detailed instructions for determining total volume.
  - i. For overflows from a manhole with the lid still in place, measure the depth of the spout of water at the rim or at the pick holes. Make a note of the depth measurement and where it was taken. Using a clock face record the areas overflowing and the measured height of the water at each five minutes of circumference. (Example: height of 1 inch from 1:00 to 2:00, height of ½ inch from 2:00 to 3:00, etc.
  - ii. For contained overflows map the containment area and measure the wetted area, including depth measurements.
  - iii. For runoff in a defined channel such as against a curb measure the width of the channel, the average depth, and the velocity of flow.
- 7. Follow the sewage stream to determine if the sewage is reaching waters of the state or entering the storm sewer system
- 8. Document any place sewage is entering waters of the state or the storm sewer system with pictures

- 9. Make a note of the point that the sewage is entering waters of the state or the storm sewer system as closely as possible using temporary markers or by noting landmarks. The name of the waterway receiving the discharge must be recorded for proper reporting.
- 10. Inform the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager of any entry into state waters.

#### B. When the overflow has been stopped:

- 1. The responders must document the time that the overflow stopped. This information is required for reporting to the state. In addition, the rate of the overflow in gallons per minute and the duration of the overflow in minutes may be used to estimate the total volume released in gallons.
- 2. The responding crews will make on site observations to help determine the cause of the release. The crew should write on the work order form any physical indicators found such as rags, grease, broken pipe, dirt, bricks, etc. If any pictures can be taken of debris removed from the manhole or line, then these pictures will be helpful in determining the cause of the overflow. All such pictures should be taken using a digital camera in automatic mode with the date stamp turned on. A yardstick or ruler should be laid next to the debris to provide a size reference.

#### III. Site Cleanup

- A. Collect as much of the sewage as possible using the vacuum truck
- B. Gather and remove sewage related debris and organic solids from the area.
- C. Using a solution of household chlorine bleach, such as Clorox or Purex, spray the affected area. Let the disinfectant remain in place for at least one-half hour. Recommended dosage of chlorine bleach is ¾ cup of liquid bleach to 50 gallons of water or 1 tablespoon of liquid bleach to five gallons of water.
- D. Wash down the area. Wash water applied after disinfection could still carry pollutants to the storm sewer system or a stream, therefore wash water must be directed away from any storm system inlet. Pools of wash water should be recovered using the vacuum truck.

#### IV. Reporting of overflows, spills, and major spills:

A. All overflows should be reported to the Environmental Manager so that a record can be kept of the location, amount, and cause of the overflow. Overflows that do not reach waters of the state will be on record with the Utilities Department. Any customers whose property is affected by the overflow should be told of the event and of all cleanup actions that have been done or are planned.

- B. If sewage does reach the waters of the state then reporting to the EPD is required, along with public notification. The required actions are listed in the Georgia Rules for Water Quality Control; section 391-3-6-.05 Emergency Actions.
  - 1. In the event of a spill: (less than 10,000 gallons released to waters of the state and no water quality violation)
    - a. The City must notify the EPD immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
    - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.
    - e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.

- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- 2. In the event of a "major spill" (over 10,000 gallons released or a water quality violation occurs) the same responses are required with some extra requirements:
  - a. The City must notify the EDP immediately by telephone or by FAX.

    Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
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    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
  - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.

- e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.
- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- g. The City must publish a notice of the major spill in the Valdosta Daily Times within seven days. The notice must include the items required in the initial report to EPD. Normally the Public Information Officer will arrange the public notice using a copy of the press release.
- h. The City must immediately begin a sampling program for the waterway affected by the major spill. Sample sites are selected upstream and downstream of the major spill site and are monitored for dissolved oxygen, temperature, pH, and fecal coliform. The Environmental Manager's staff will be responsible for selecting sites, collecting samples, and performing on site tests.
- C. Responding to backups to homes resulting from sanitary sewer overflows
- D. Recording of overflows that do not reach waters of the state
  - 1. The Environmental Manager will maintain records of all sanitary sewer overflows whether or not there is discharge to the waters of the state. Therefore, all overflows must be reported to the Environmental Manager. In the event that the position of Environmental Manager is eliminated from the department organizational structure, the maintenance of overflow records will be reassigned by the Utilities Director, and the Standard Operating Procedure updated to reflect this change.
  - 2. The following information will be recorded for overflows that do not reach waters of the state:
    - a. Date and time the overflow began
    - b. Date and time the overflow ended
    - c. Location of the overflow
      - i. By address if one exists for the location
      - ii. By Latitude and Longitude if no address exists
      - iii. By manhole identification number if a manhole is involved
      - iv. By upstream and downstream manhole identification numbers is a pipe break is involved

- d. Cause of the overflow
- e. Volume discharged
- f. Volume recovered
- g. Final disposal of recovered sewage
- h. Description of cleanup

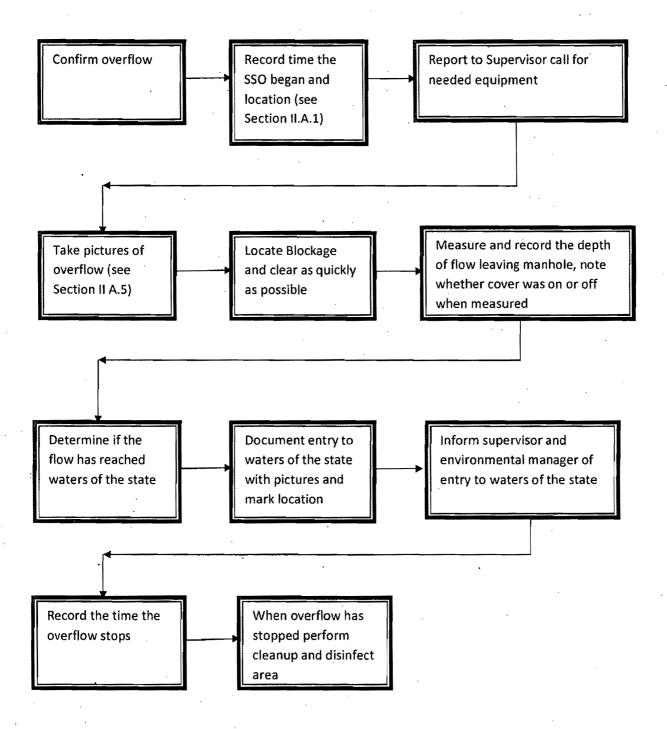
# E. Responding to backups that enter homes

- 1. The following information will be recorded for overflows that enter houses
  - a. Date and time of the backup
  - b. Address of the house
  - c. Name of the resident and owner
  - d. Cause of the overflow
  - e. Volume discharged
  - f. Volume recovered
  - g. Final disposal of recovered sewage
  - h. Description of cleanup
- 2. The collection system supervisor or crew leader will contact the Utilities Office Coordinator to report a backup into a residence
- 3. The Utilities Office Coordinator will arrange for professional cleaning services for the residence
- 4. The resident or home owner will be provided information on procedures for filing a claim

# City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date:	•	·	
Type of Occurrence:			
Date of Spill:			
Time Started or identified:			
Time Stopped:	announce-		
Location:			
Amount:			
Did spill reach "Waters of the State"?			
Receiving water:			
Cause:			
Corrective Action:		•	
•			
Upstream sampling site will be:	•		
Downstream sampling site will be:	· · · · · · · · · · · · · · · · · · ·		
Reported by:			
Contact number:			è

# Sanitary Sewer Overflow Response Process



# Spill Documentation and Spill Volume Calculation Guidance

# **D.1** Spill Documentation

Upon initial discovery of a spill, utility personnel should document and record the following information:

- Date;
- Time (based on best professional judgment, estimate the start time of the overflow prior to initial discovery or establish the start of the spill at the time of receipt of a customer service request reporting of a spill);
- Description of spill.
- · Where it started;
- Where the spill discharged to (describe the nearest receiving water body and conduct a visual inspection for signs of algae, rags, raw sewage, and debris; also inspect and describe immediate upstream and downstream areas);
- Determine time period of long term spill events (evidence such as algae growth indicates a long term spill and it is estimated that algae growth occurs after one month of exposure to sewage); and
- Estimate volume since discovery of the spill.
- Use photographs to document all information possible.

# D.2 Spill Volume Calculation

The following sections provide guidance for estimating spill flow volume for manholes, broken pipes, wet weather, and pump station outage. This is provided as guidance only however, if a different method is used to calculate spill volume, that method should be validated and described.

#### D.2.1 Broken Lines

Table D-1 provides Spill Volume Calculation by Flow Rate for different size pipes.

VERSION 4/18/2006 D-2

#### SANITARY SEWER FLOW RATES FOR SPILL DETERMINATIONS

Depth of Flow (Inches)									
(mones)	Pipe Size  6 8 10 12 15 18 21 24 30								30
1	15	20	25	30	35	40	45		100
5	50	60	70	80	85	.95	105	125	145
3	90	110	125	135	150	175	185	210	230
4	125	160	180	200	235	260	285	320	350
5	155	190	240	280	315	360	380	445	470
6	180	260	310	355	415	455	500	555	630
7	100	290	370	425	495	570	620	895	770
8 ·		320	430	500	600	680	760	815	1010
	-	320		+	690			<del></del>	
9			465	575		800	890	965	1260
10	<u> </u>	<u>'</u>	490	625	775	905	1005	1120	1360
11	-			685	870	1020	1135	1275	1490
12	-			715	935	1130	1260	1410	1630
13	<b> </b>			<u> </u>	1020	1240	1415	1580	1870
14				<u> </u>	1070	1345	1520	1690	2110
15			_		1105	1425	1650	1850	2220
16	<u> </u>					1495	1760	1990	2560
17 -				·		1550	1880	2110	2730
18						1595	1980	2285	2940
19							2050	2410	3100
20							2115	2530	3330
21							2160	2630	3510
22								2700	3780
23		<b>-</b>		<del></del>				2765	3900
24								2820	4040
									4130
¥	<del></del>	1							4200
									4250
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Gallons per Minute @ V=2.0 feet per second (ft/sec) and n=0.013; Adjust accordingly for flat or steep sloped sewers.

VERSION 4/18/2005 D.

#### SPILL CALCULATION PROCEDURES

- Determine and record the time of initial caller notification of sewer spill.
- Measure and record the flow in inches immediately downstream of spill or blockage and determine flow rate in gallons per minute (gpm) using table above. Record the pipe size in inches.
- Clear obstacles from blocked sewer, allow free and steady flow to stabilize. Note time the flow stabilizes.
- 4. Measure the depth of flow in inches in the previously blocked sewer and determine flow rate from table above.
- 5. Subtract the flow rate from the downstream sewer determined in 2 above from the flow rate from the previously blocked sewer determined in 4 above and multiply the result by the elapsed minutes from notification to clearance.
- 6. Report total amount spilled to Supervisor or Superintendent

#### SEWER OVERFLOW AND SPILL PROCEDURES

- 99% of all visible debris should be removed from the site.
- 2. Areas where sludge is pooled should be pumped back into sewer.
- 3. Site should be raked and limed to neutralize sludge accumulations.
- Deodorant should be applied to neutralize odor problems.
- Areas below where spill entered stream should be checked for visible debris or sludge on banks.
- 6. Crew Chief should document on Work Order extent of cleanup completed and note whether repeat visits for additional lime applications are needed.
- Crew Chief should insure that Supervisor or Superintendent has notified the GA
   EPD (during normal duty hours) or that Dispatch has notified GA EPD (during offduty hours). Telephone notification is required with backup letter report.
- 8. If spill has occurred at a national park, National Park Service also should be notified using same procedures as noted above.
- Supervisor or Superintendent should insure that spill location is entered into the GIS database.
- Superintendent and Division Manager should identify repeat locations and develop plan to eliminate further spills at these locations.

# D.2.2 MANHOLE OVERFLOWS (Adapted from Guidance from GA EPD)

The following guidance can used in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used. The following manhole SSO quantification methods are provided as guidance.

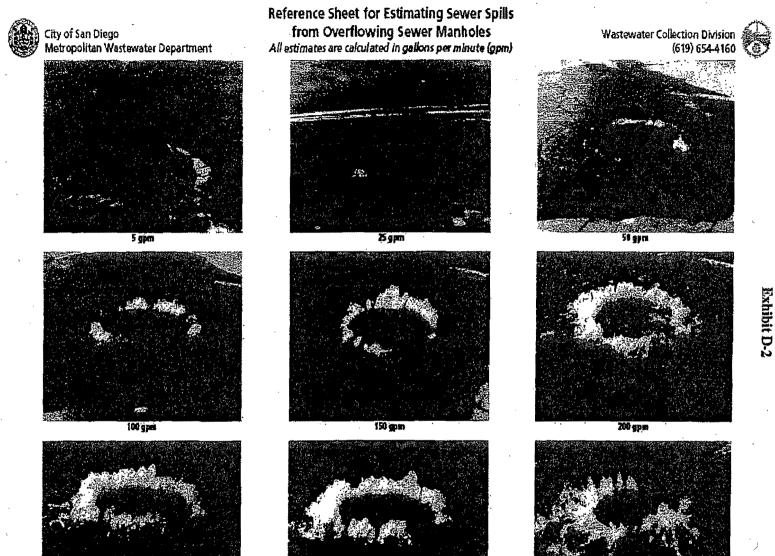
VERSION 4/18/2006 D.4

# D.2.2.A Estimating Spill Flow rates for overflowing manholes

This is a visual estimating method. Please refer to Exhibit D-2 for the Reference Sheet. Source: City of San Diego Metropolitan Wastewater Department.

VERSION 4/18/2006

D-5



All photos were taken during a demonstration using metered water from a hydrant in cooperation with the City of San Diego's Water Department.

ex 4.99

Ξ,

#### D.2.2.B Volume of SSO at Manhole

Length x Width x Depth x 7.48 = gallonsSpill area = 20 feet by 30 feet = 600 sq. ft. Depths of spill = 3 inches = 0.25 feet Volume =  $20 \times 30 \times 0.25 \times 7.48 = 1,122 \text{ gallons}$ 

#### D.2.3 WET WEATHER OVERFLOW CALCULATION:

The following can be used to help in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used.

All calculations are based on an estimate of the size of the opening involved, the velocity of flow through the opening, and the duration of time the overflow occurred. In most all occurrences, the opening size and velocity will change over an event from low to high back to low. Judgment on an average condition must thus be attempted to reach a realistic rate of loss.

## D.2.3.A. Loss through vent holes

1. Size of opening:

Assume holes at 1- inch diameter

Area = (number of holes) ( $\pi$ ) ( $D^2/4$ ) ( $1ft^2/144$ ) Area = (number of holes) (3.14) (1/4) (1/144)

Area = (number of holes)  $(0.0055ft^2/hole)$ 

### 2. Velocity Plume Guide

Velocity through holes, based on Velocity Head = (Velocity<sup>2</sup>/2g)

Plume height	<u>Velocity</u>
1-inch	2.0 ft/sec
2-inch	3.3 ft/sec
3-inch	4.0 ft/sec
4-inch	4.6 ft/sec
5-inch	5.2 ft/sec
6-inch	5.7 ft/sec

#### Time = convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example: Top wit

Top with six hole, flow through holes makes a one-inch high plume,

last for 4 hours, 15 minutes

Volume =  $(6 \text{ holes } \times 0.0055 \text{ ft}^2/\text{hole}) (2\text{ft/sec}) (255 \text{ min}) (448 \text{ gpm/cfs})$ Volume = (0.033) (2) (255) (448) = 7540 gallons

#### D.2.3.B. Loss around edge of non-vented cover

#### 1. Size of opening:

As the weight of manhole lid will generally hold it in place until internal pressures exceed 0.4 pounds/sq. in., loss occurs through imperfections, grit, etc. between the lid and manhole frame. Observations are generally a vertical ring of water from side gap between the lid and frame of approximately ¼ inch width.

Area = 
$$(\pi)$$
 (D) (1/4 inch) (1/12 in/ft)  
= (3.14) (2ft) (1/4) (1/12)

Area = 
$$0.131 \text{ ft}^2$$

# 2. Velocity through gap

(see vertical plume guide above, D.3.A.2.)

#### 3. Time - convert to minutes

#### Example:

Manhole with 4-inch plume around edge for 2 hours, 15 minutes

## D.2.3.C. Loss from tilted cover

#### 1. Size of opening:

Some estimate has to be made in the field concerning how much gap exists in order to do this calculation. For the following amounts of lift of one side, the areas are as follows:

$$A = (\pi)$$
 (D) (in of lift) (1/12 ft/in) (1/2)  
 $A = (3.14)$  (2ft) (in. of lift) (1/12) (1/2)  
 $A = 0.262$  (in. of lift)

Lift (inches)	Area (ft²)
1	0.262
2	0.524
3	0.786
4	1.048

#### 2. Velocity through opening

This must be estimated from visual observation. A low rate would be 2/ft/sec, moderate rate at 4 to 5 ft/sec, high rates up to 7 ft/sec. Over 7 ft/sec, the lid will

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probably blow off the manhole. The gap (lift) will generally increase with higher velocity as well.

#### 3. Time – convert to minutes

Example:

Field observation of 2-inch gap and velocity of 4 ft/sec for a period of 3 hours, 30 minutes.

Volume (Gal.) = 
$$(0.524 \text{ ft}^2)$$
 (4ft/sec) (210min) (448)  
= 197,192 gallons

#### D.2.3.D. Loss from Manhole without a lid in place

If no cover exists, an estimate of the average height the water column (plume) extends above the top of the manhole frame must be made. Use the height to velocity estimate from (A) above to estimate the velocity. Be sure to adjust the height estimate downward for the affects of debris around the edge of the rim which will cause the height to be incorrectly high.

Area = (n) 
$$(D^2/4)$$
 = (3.14)  $(2^2/4)$  = 3.14 ft<sup>2</sup>

Velocity - from field observation of water column height

Time - convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example: inch

A manhole without a lid was observed to have an overflow with a 3 – high column of water for a period of 6 hours, 10 minutes

Volume (Gal.) = (3.14) (4.0 ft /sec) (370) (448) Volume = 2,081,946 gallons

#### D.2.3.E. Other

- 1. Generally approach of estimating a cross sectional area where the flow is leaving and a velocity of flow can be used to determine a rate. This can be applied to any situation.
- Several observations over an event to estimate the area and velocity are better than a single observation. The overflow examples above assume a constant rate over the period which will estimate volumes too high. As an example, if an hour at the beginning and end of each event is assumed for the flow to build up from zero to maximum and back to zero, a calculation could be done as follows:

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#### Example:

A manhole with a cover tilted open 2 inched with an estimated velocity of 4 ft/sec at its worst rate of loss for two hours and about 1-inch tilt with a velocity of 2 ft/sec observed at two other occasion over a 7 hour total event.

Worst case: 2 hours, 2 inched tilt, 4 ft/sec
Other times: 1 inch tilt, 2 ft/sec, time unknown

Total overflow time: 7 hours

### Divide total of 7 hours into several periods

1st hour:

Start to 1-inch tilt, 2 ft/sec

Volume (Gal.) = (Area) (Velocity) (Time) (448) x 50% = (0.262) (2) (60) (448) (0.50) = 7,043 gallons

7th hour:

1-inch tilt, 2 ft/ sec down to end Same as above situation

Volume = 7.043

= 7,043 gallons

#### 5 remaining hours:

2 hours at 2-inch tilt, 4 ft/sec 3 hours at 1-inch tilt, 2 ft. sec

Volume = (0.524) (4 ft/sec) (120 min) (448) = 112,681 gallons

Volume = (0.262) (2 ft/sec) (180 min) (448) = 42,255 gallons

Event Total = 7,043 + 7,043 + 112,681 + 42,255 = 169,022 gallons

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# **ATTACHMENT 6**

Corrective Action Plans and Schedules Revised September 11, 2013

# **Corrective Action Plans and Schedules**

Action Item No.	Action Description	Completion Date
1a. (Phase 1)	Pump Station, Force Main, Headworks and Equalization Basin Project: Design and construct two new master pump stations, two smaller pump stations, a new force main, and a new headworks structure with grit removal and bar screens at the location of the existing Withlacoochee WPCP. Complete construction of a 6.0 MG equalization basin, which will be included at this site for initial wet weather flows and future flow equalization through the new treatment plant. The flow from this project will be gravity fed to the existing WPCP for final treatment and discharged utilizing the existing plant outfall. This project will replace an existing 54-inch gravity sewer main to the current plant as well as the existing influent pump station, both of which are highly prone to severe inflow and flooding from the Withlachoochee River.	July 2016
1b. (Phase 2)	Relocation of Withlacoochee WPCP to new location 60 feet above current flood level: Complete construction of the relocated Withlacoochee WPCP. Upon completion, the relocated Withlacoochee WPCP will continue to use the existing Withlacoochee WPCP outfall on the Withlacoochee River.	August 2017
2.	Collection System Evaluation Program: Complete a 5-year system wide plan to evaluate the entire sanitary sewer collection system (300 total miles of lines, with 75 miles already evaluated) and develop a schedule for repairs. The evaluation will include the inspection of all manholes and collection system lines using smoke testing first to be followed by Closed Circuit Television (CCTV) Inspections of high priority areas. The evaluation will be utilized to prioritize and perform critical repairs and to plan and prioritize major rehabilitation projects for the future. A schedule to complete major rehabilitation projects identified during the evaluation will be submitted for EPD approval by December 2018.	December 2018
3.	Manhole Replacement/Rehabilitation Program: Continue implementing the existing program and complete the inspection of approximately 3,390 remaining manholes (2,610 inspected to date). Prioritize replacement or rehabilitation of the most deteriorated manholes. Complete the replacement or rehabilitation of a minimum of 60 manholes each year until all Priority 1 manholes are completed. A schedule will be submitted to EPD for ongoing rehabilitation to address Priority 2, and all remaining manholes, on an annual basis.	December 2018
4a.	Lift Station Rehabilitation/Replacement Program: Continue implementing existing rehabilitation/replacement program until all existing older lift stations are rehabilitated or replaced. This will include connection to SCADA and/or auto-dialer systems, along with emergency power capabilities for connection to portable generators.	December 2018

4b.	Purchase Portable Generators for lift stations: The purchase of three portable generators will be completed (one per year, with the first generator purchased by December 2014) so that any existing lift stations not wired with two independent electric feeds can be connected to a portable generator for emergency power needs. In addition to the generators, the City will work with Godwin Pumps to meet emergency bypass pumping needs at each lift station whenever needed.	December 2016
5.	Ongoing Repairs to the Existing Withlacoochee WPCP: Ongoing repairs to the existing Withlacoochee WPCP will be conducted to maintain permit compliance until such time as the new treatment plant is brought online. Present repairs include new bar screens and temporary blower system.	August 2017

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

# **ATTACHMENT 7**

Sanitary Sewer Projects Completed By the City From 2009 to Present April 9, 2013

	Completed Sewer Projects from 2009 to Present		
No.	Project		Cost
1	CMMS for the Utility Department	\$	85,00
2	Mud Creek Emergency Manhole Repair	\$	103,00
-3	Withlacoochee Biosolids Converyor Repair (FEMA)	\$	52,00
4	Withlacoochee Multi-Media Filters Repair (FEMA)	\$	46,00
5	Replacement of SO2 and CL2 systems (FEMA)	\$	82,700.0
6	Replacement of Reuse system controls (FEMA)	\$	13,377.5
77	Eectronics dryout and replacement of pannels, transformers, and misc	\$	169,277.0
	components (FEMA)		
8	30% Design for Force Main, EQ Basin and Lift Stations	\$	100,00
9	CCVT Evaluation of Mud Creek and Knights Creek Trunk Lines	¢.	122,00
10	Cleaning of Withlacoochee Influent Pump Station Wet Well	\$	373,00
11	Rehabilitation of Four Problematic Lift Stations	\$	1,500,00
12	Withlacoochee Nitrification Pump Replacement	\$	60,00
13	Withlacoochee Influent Pump Station Impeller Replacement	\$	90,00
14	Withlacoochee RAS Controller Replacement	\$	36,00
15	Thickener pump replacement	\$	53,068.0
16	Valve actuators for liftstation	\$	8,369.(
17	3 - 14hp Wilo pumps	\$	38,110.5
18	RAS pump impellers	\$	33,642.0
19	4 - 5hp submersible pumps	\$	20,154.0
20	Phase 1 Manhole Rehabilitation	ு \$	20,134.0
21		ъ \$	72,00
22	Country Club Emergency Manhole Repair Withlacoochee Roughing Tower Controller Replacement	Տ	72,00 38,00
23	Purchase of 75-acres for Relocation of Plant	Ф. \$″	1,012,50
		\$ \$	50,00
24 25	Water and Sewer Rate Analysis Construction of Tucker Road Lift Station	*. *	and the same of th
THE STREET STREET	7 TO TO TO TO THE SERVED SELECTION OF THE SERVED SE	\$ ***	204,00
26	Withlacoochee Belt Press Major Repairs Phase 2 Manhole Rehabilitation	\$	52,00
27		\$	237,0
28	Goodyear Lift Station Rehabilitation	<b>.</b>	104,0
29	CCTV work for Big County Lift Station Service Area	<b>)</b>	108,00
30	100% Design for Force Main, EQ Basin and Lift-Station	\$	1,400,00
31	Withlacoochee Emergency Repairs for broken 20-inch Valve	\$	616,0
32	Withlacoochee Sludge Pump Replacement	\$	54,00
33	Blanchard Street Emergency Repairs	\$	234,00
34	Temporary Bar-Screens at Withlachoochee	\$	104,7
35	Temporary Blower System at Withlachoochee	\$	376,1
36	Projected Easement costs for force main project	\$	370,00
37	Recent emergency repairs at Withlachooche follow Flood	\$	203,22
38	Repair to Tucker Road Outfall	\$	27,46
40	Mud Creek WPCP Expamnsion and Upgrades	\$	41,000,00
	Total:	\$	49,453,78

### **Ammons, Brad**

From:

Diaz, Denisse

Sent: To: Friday, September 27, 2013 2:30 PM Horsey, Maurice; Ammons, Brad

Subject:

RE: Valdosta, Georgia Hazardous Waste Spills

Thanks!

From: Horsey, Maurice

Sent: Friday, September 27, 2013 2:29 PM

To: Diaz, Denisse; Ammons, Brad

Subject: RE: Valdosta, Georgia Hazardous Waste Spills

Here's the P/N on GAEPDs website. Comment period 9/25 thru 10/25.

http://www.gaepd.org/pls/enfo/epdorders.p\_orders

Maurice L. Horsey, IV

Maurice L. Horsey, IV | Chief

Municipal & Industrial Enforcement Section

Clean Water Enforcement Branch

U.S. Environmental Protection Agency | Region IV

Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

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From: Diaz, Denisse

Sent: Friday, September 27, 2013 1:50 PM

To: Horsey, Maurice

**Subject:** RE: Valdosta, Georgia Hazardous Waste Spills

I have the one that you sent, but do we have a copy of the signed one? Jane said it should be in their electronic file system, but I would hope that they can send us a copy. We will also probably need a copy of the public notice. Maybe Brad can call Marzieh on Monday and get copies of those two documents. Thanks!

From: Horsey, Maurice

Sent: Friday, September 27, 2013 1:46 PM

To: Diaz, Denisse

Subject: RE: Valdosta, Georgia Hazardous Waste Spills

I sent you all the draft AOC last week from Marzieh. Do you need me to resend?

# Maurice L. Horsey, 90

Maurice L. Horsey, IV | Chief
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch
U.S. Environmental Protection Agency | Region IV
Direct: 404.562.9764 | Fax: 404.562.9729
horsey.maurice@epa.gov | www.epa.gov

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From: Diaz, Denisse

Sent: Friday, September 27, 2013 1:40 PM

To: Giattina, James

Cc: Mundrick, Doug; Horsey, Maurice

Subject: RE: Valdosta, Georgia Hazardous Waste Spills

Jim:

I just spoke with Jane Hendricks from GA EPD. The City of Valdosta has signed the order on consent and it is now on public notice. It will be finalized once the comment period has ended. Let me know if you want to provide a copy of the order to Drew.

#### Denisse

From: Giattina, James

Sent: Friday, September 27, 2013 12:25 PM

To: Bartlett, Drew

Cc: Frick, Thomas; Diaz, Denisse

Subject: RE: Valdosta, Georgia Hazardous Waste Spills

I'm checking into it for you...Jim

From: Bartlett, Drew [mailto:Drew.Bartlett@dep.state.fl.us]

Sent: Thursday, September 26, 2013 5:53 PM

**To:** Giattina, James **Cc:** Frick, Thomas

Subject: FW: Valdosta, Georgia Hazardous Waste Spills

Have you heard any news?

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.

From: Kay Donahue [mailto:bkd@triad.rr.com]
Sent: Thursday, September 26, 2013 5:20 PM

**To:** Bartlett, Drew; Sewage Spill; Sewage S

Ladies and Gentlemen

My family owns property along the Withlacoochee River in Hamilton County. I know that Governor Scott has been concerned about fresh water spillage affecting the marsh estuaries and I hope the Governor is equally disturbed by raw sewage wastes getting into estuaries as well. As you know there have been numerous raw sewage spills into the Withlacoochee River (which flows into the Suwannee River and then on into the Gulf) by Valdosta since 2008. While Valdosta would like to blame the spills this year on the heavy rain, this is not an adequate explanation. The spills have been going on for many years simply because their sewage system is antiquated and inadequate...and more importantly, it appears that NOTHING is being done about it by the EPA or other Federal agencies as well as the Florida, Valdosta or Georgia state administrations. Sitting on the sideline and saying it is not Florida's responsibility is simply irresponsible. These raw sewage spills are life threatening to humans, wildlife, as well as swine and cattle on farms long the way that depend on the water for their livestock. Furthermore, the pollution and threat this poses adversely affects the value of property along the river as well as land owners enjoyment of their property.

I am an attorney and I know legal action can be taken against both Valdosta and the State of Georgia by Florida and the EPA to abate and accelerate a suitable permanent remedy on behalf of Florida's citizens who are being harmed by this situation. It is unreasonable to expect private land owners to expend the kind of money and resources that would be required to make a difference in this arena. Land owners along the river either have a small fishing cottage or are busy trying to make a living farming along a river that cannot be used for drinking water. (Livestock must be kept fenced away from the water and fresh water trucked in to them. This is a tremendous burden on farmers.)

#### Please answer the following questions:

- 1. To date, what, if any, legal actions have been commenced by the State of Florida or the EPA against Valdosta and the State of Georgia to stop, abate and remedy this horrible and dangerous ongoing situation? If no action has been taken, why not?
- 2. Has an action been commenced by the appropriate office of the Southern Environmental Law Center giving the 60 day notice of intent to sue under the Clean Water Act or has a Judicially Approved Consent Order been entered requiring remediation by a date certain? If not, why not?
- 3. How many Florida citizens have been physically harmed by contact or exposure to raw sewage in these rivers and tributaries since these raw sewage spills commenced? What are their injuries? (I understand that there have been very serious illnesses contracted from the raw sewage and serious consequences of those illnesses, including loss of limbs even from exposure to river water after it dumped into the Gulf.)
- 4. What if any fines for these ongoing violations of the Clean Water Act. Have been levied by responsible Government agencies and are in place against Valdosta at this time? If none have been levied, why not?

On behalf of members of my family and Florida's citizens, I ask that the Southern

Environmental Law Center, the Florida Governor's office, and your offices take whatever action is necessary to see that this situation is remedied as soon as possible. I also ask that you promptly respond to this communication and my questions in detail.

You all can put pressure on the appropriate Georgia state and Federal agencies having jurisdiction of this matter and make this happen sooner rather than later, especially if fines are put in place pending a suitable resolution. Your failure to do so would be irresponsible. I understand that there are emergency Federal funds available for this purpose. Clearly this is a situation where those funds should be expended.

Time is of the essence. This has been ongoing since 2008. Further delay is not acceptable.

Thank you in advance for your prompt attention and response to our family's concerns.

Kay Donahue

#### Ammons, Brad

From:

Horsey, Maurice

Sent:

Tuesday, September 17, 2013 1:49 PM

To:

Ammons, Brad

Subject:

FW: Valdosta Order

Attachments:

valdosta.pdf

fyi ~

Maurice L. Horsey, IV

Maurice L. Horsey, IV | Chief Municipal & Industrial Enforcement Section Clean Water Enforcement Branch U.S. Environmental Protection Agency | Region IV Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

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From: Marzieh Shahbazaz [mailto:Marzieh.Shahbazaz@dnr.state.ga.us]

Sent: Tuesday, September 17, 2013 1:21 PM

To: Horsey, Maurice

Subject: RE: Valdosta Order

Hi Maurice, signed letter with CO and attachments in one pdf document. Thanks

Marzieh Shahbazaz Municipal Compliance Manager Wastewater Regulatory Program Watershed Protection Branch Tel. 404-675-1684

Fax. 404:362-2691

From: Horsey, Maurice [mailto:Horsey.Maurice@epa.gov]

Sent: Tuesday, September 17, 2013 11:59 AM

To: Marzieh Shahbazaz Subject: RE: Valdosta Order

**Thanks** 

Maurice L. Horsey, 90

Maurice L. Horsey, IV | Chief
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch
U.S. Environmental Protection Agency | Region IV
Direct: 404.562.9764 | Fax: 404.562.9729
horsey.maurice@epa.gov | www.epa.gov

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**From:** Marzieh Shahbazaz [mailto:Marzieh.Shahbazaz@dnr.state.qa.us]

Sent: Tuesday, September 17, 2013 10:59 AM

To: Horsey, Maurice

Subject: RE: Valdosta Order

Order has not been signed yet, we are mailing it out right now, it is a draft proposed, I will scan the signed letter and Email it to you. thanks

Marzieh Shahbazaz Municipal Compliance Manager Wastewater Regulatory Program Watershed Protection Branch Tel. 404-675-1684 Fax. 404-362-2691

**From:** Horsey, Maurice [mailto:Horsey.Maurice@epa.gov]

Sent: Tuesday, September 17, 2013 10:51 AM

To: Marzieh Shahbazaz Subject: RE: Valdosta Order

Thanks Marzieh. Do you have the signed copy of the Order and letter. Thanks

Maurice L. Horsey, IV

Maurice L. Horsey, IV | Chief Municipal & Industrial Enforcement Section Clean Water Enforcement Branch U.S. Environmental Protection Agency | Region IV Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

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it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

From: Marzieh Shahbazaz [mailto:Marzieh.Shahbazaz@dnr.state.qa.us]

Sent: Tuesday, September 17, 2013 10:46 AM

To: Horsey, Maurice

Subject: FW: Valdosta Order

Marzieh Shahbazaz Municipal Compliance Manager Wastewater Regulatory Program Watershed Protection Branch Tel. 404-675-1684 Fax. 404-362-2691

From: Marzieh Shahbazaz

Sent: Tuesday, September 17, 2013 10:35 AM

**To:** 'horsey.maurice@epa.com' **Subject:** FW: Valdosta Order

Hi Maurice, please see the attached order, it is still confidential. thanks

Marzieh Shahbazaz Municipal Compliance Manager Wastewater Regulatory Program Watershed Protection Branch Tel. 404-675-1684

Fax. 404-362-2691

From: Kim Hembree

Sent: Friday, September 13, 2013 11:32 AM

To: James Capp

Cc: Jane Hendricks; Marzieh Shahbazaz

Subject: RE: Valdosta Order

From: James Capp

Sent: Friday, September 13, 2013 11:26 AM

To: Kim Hembree

Cc: Jane Hendricks; Marzieh Shahbazaz

Subject: RE: Valdosta Order

No. I want the electronic files now. Thanks.

----Original Message----

From: Kim Hembree [Kim.Hembree@dnr.state.ga.us]

Received: Friday, 13 Sep 2013, 11:10am

To: James Capp [James.Capp@dnr.state.ga.us]

CC: Jane Hendricks [Jane.Hendricks@dnr.state.ga.us]; Marzieh Shahbazaz [Marzieh.Shahbazaz@dnr.state.ga.us]

Subject: RE: Valdosta Order

Ok. As soon as I get the signed copy I will scan the entire package and email it to you to convey to the City.

#### Thanks!

From: James Capp

Sent: Friday, September 13, 2013 11:07 AM

To: Kim Hembree

Cc: Jane Hendricks; Marzieh Shahbazaz

Subject: RE: Valdosta Order

I still need to sign transmittal letter. I'm off site until after lunch. Arnettia still has paper package. I will stop by and sign letter early afternoon.

----Original Message----

From: Kim Hembree [Kim.Hembree@dnr.state.ga.us]

Received: Friday, 13 Sep 2013, 10:30am

To: James Capp [James.Capp@dnr.state.ga.us]

CC: Jane Hendricks [Jane.Hendricks@dnr.state.ga.us]; Marzieh Shahbazaz [Marzieh.Shahbazaz@dnr.state.ga.us]

Subject: Valdosta Order

Jac,

Our secretary isn't here and I want to make sure the Valdosta order goes out today. Do you still have it?

Kim Hembree

Environmental Specialist III
Wastewater Regulatory Program
Georgia Environmental Protection Division

Phone: 404.362.2605 Fax: 404.362.2691

# **Georgia Department of Natural Resources**

Environmental Protection Division • Watershed Protection Branch 4220 International Parkway • Suite 101 • Atlanta • Georgia 30354

(404) 675-6232; Fax (404) 675-6247 Judson H. Turner, Director

COPY

September 12, 2013

Honorable John Gayle, Mayor City of Valdosta Post Office Box 1125 Valdosta, Georgia 31603-1125

RE: Revised Proposed Consent Order

City of Valdosta

Withlacoochee Water Pollution Control

Plant

NPDES Permit No. GA0033235

Mud Creek Water Pollution Control Plant

NPDES Permit No. GA0020222

### Dear Mayor Gayle:

On June 25, 2013 the Georgia Environmental Protection Division (EPD) submitted to the City of Valdosta (City) a proposed consent order (Order) to address raw sewage spills to waters of the State; major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules and Regulations for Water Quality Control, from the Withlacoochee WPCP and Mud Creek WPCP outfalls to waters of the State; and permit effluent limitation violations of the Withlacoochee WPCP and Mud Creek WPCP NPDES Permits.

Enclosed is the revised proposed Order that was negotiated between EPD and the City. If you agree with the terms and conditions of the revised Order, please sign and date the order in the signature block for the City and return it to this office within 15 days from receipt of this letter. Please do not place a date on the lines above the Director's signature block. These lines will be filled in when the order is executed.

If you have any questions, please contact Jane Hendricks at 404.675.6232. Your cooperation is appreciated.

Sincerely,

James A. Capp, Chief

Watershed Protection Branch

JHT/kh Enclosure ENVIRONMENTAL PROTECTION DIVISION

OF THE

DEPARTMENT OF NATURAL RESOURCES
STATE OF GEORGIA

IN RE: CITY OF VALDOSTA

ORDER NO. EPD-WQ-

CONSENT ORDER

WHEREAS, the City of Valdosta (City) was issued National Pollutant Discharge

Elimination System (NPDES) Permit Nos. GA0033235 and GA0020222 (Permits) by the

Director of the Georgia Environmental Protection Division (Director, EPD) for its Withlacoochee

Water Pollution Control Plant (WPCP) and Mud Creek WPCP, respectively, located in the

Suwannee River Basin; and

WHEREAS, the Permits authorize the City to discharge treated wastewater according to

effluent limitations, monitoring requirements, and other conditions set forth in the Permits; and

WHERAS, from January 1, 2008 to June 30, 2013, the City reported an excessive

number of effluent violations of Permit Nos. GA0033235 and GA0020222 (see Attachment 1);

and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive

number of raw sewage spills from its sanitary sewer collection system to waters of the State

(see Attachment 2); and

WHEREAS, Chapter 391-3-6-.05(2)(a) of the Rules and Regulations of the State of

Georgia for Water Quality Control (Rules) defines a spill as "any discharge of raw sewage by a

Publicly Owned Treatment Works (POTW) to the waters of the State"; and

WHEREAS, Chapter 391-3-6-.05(2)(b)(2) of the Rules defines a major spill, in part, as

"Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water

quality violations in the waters of the State"; and

WHEREAS, the City reported two fish kill events downstream of the November 18, 2009

1

and February 21, 2013 spills; and

WHEREAS, on November 20, 2009 and February 22, 2013, the Wildlife Resources Division investigated the fish kill events (see Attachment 3); and

WHEREAS, from January 1, 2008 through July 31, 2013, the City reported an excessive number of major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules, from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State (see Attachment 4); and

WHEREAS, Chapter 391-3-6-.05(2)(b)(1) of the Rules defines a major spill, in part, as "The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit of biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids" [amended August 2012]; and

WHEREAS, Chapter 391-3-6-.03(3)(I) of the Rules defines waters of the State as any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation; and

WHEREAS, the spills to State waters documented in Attachments No. 1 and 2 of this Order meet the definition of a spill or major spill; and

WHEREAS, on March 31, 2009, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City's April 1, 2009 and April 14, 2009 letters, an estimated 50,300,000 gallons of raw sewage was discharged to the Withlacoochee River from March 31, 2009 to April 2, 2009; and

WHEREAS, on March 27, 2009, Governor Sonny Perdue declared Lowndes County to

be in a State of Emergency due to heavy rains and severe weather; and

WHEREAS, on April 23, 2009, President Barack Obama declared South Georgia counties, including Lowndes County, federal disaster areas; and

WHEREAS, in July 2009, the City applied for federal funding with the Federal Emergency Management Agency (FEMA) to secure approval of, and funding for, damages to the Withlacoochee WPCP from the flood of March 2009; and

WHEREAS, on December 7, 2009, the Mud Creek WPCP sanitary sewer manhole receiving all influent flow into the WPCP collapsed, along with associated piping, and, according to the City's December 14, 2009 report to EPD, an estimated 5,500,000 gallons of raw sewage spilled into Mud Creek from December 8, 2009 to December 13, 2009 spill; and

WHEREAS, in a letter to EPD, dated January 4, 2010, the City stated that during the December 8-13, 2009 major spill, a major leak was discovered by close circuit television equipment just downstream from one of the plugged influent lines, allowing significant groundwater inflow into the repaired manholes and lines; and

WHEREAS, on January 5, 2010, representatives of the City and EPD held a teleconference to discuss the City's sanitary sewer system; and

WHEREAS, during the January 5, 2010 teleconference, the City advised EPD of work completed on the sanitary sewer system, various initiatives implemented by the City since October 2008, and the City's commitment to continue to address its sanitary sewer system issues; and

WHEREAS, in a correspondence, dated January 6, 2010, the City submitted to EPD a Sanitary Sewer Condition Assessment and Rehabilitation Program, Condition and Criticality Report, and Sewer System Modeling and Capacity Evaluation Report (Assessment Program); and

WHEREAS, the City completed construction of the renovated Mud Creek WPCP

WHEREAS, on April 6, 2010, representatives of the City and EPD held a teleconference to discuss clarification of the City's Assessment Program and to request the City to submit updated schedules for completion of specific sewer system projects; and

WHEREAS, on April 21, 2010, at the request of the City, representatives of the City and EPD met to further discuss corrective actions to address the City's sanitary sewer system, the amount of work the City has completed with regard to its sewer system, and the City's commitment to continue to address its sanitary sewer system; and

WHEREAS, in April 2012, the City completed the renovation and expansion of the Mud Creek WPCP. Since completion of the renovations and expansion, the Mud Creek WPCP has met permit effluent limitations for pollutant parameters; and

WHEREAS, on August 1, 2012, the City was denied federal funding from FEMA; and

WHEREAS, according to the City, the denial followed a final appeal prepared by FEMA staff and FEMA's external consultant, in which they concluded the proposed project to build a new force main system, equalization basin, headworks and relocation of the WPCP was eligible, feasible and cost effective; and

WHEREAS, in a letter dated October 23, 2012, the United States Environmental Protection Agency Region 4 (EPA) submitted a request to the City, under Section 308 of the Clean Water Act, for information regarding the Withlacoochee WPCP, the Mud Creek WPCP, and their associated sanitary sewer collection systems; and

WHEREAS, on February 28, 2013, at the City's request, the City met with EPA to discuss the City's sanitary sewer system issues and plans to address those issues, including funding alternatives and timelines of completion. In addition, the City requested that EPA allow them to work directly with EPD on a corrective action plan; and

WHEREAS, on February 28, 2013, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather; and

WHEREAS, on March 13, 2013, a meeting was held between the City and EPD to discuss recent flooding issues at the Withlacoochee WPCP and the City's plans to address its sanitary sewer system issues, including specific projects, timelines and funding sources, as well as a proposed corrective action plan; and

WHEREAS, in a letter to EPD, dated March 14, 2013, the City stated that due to the flooding on February 28, 2013 the Withlacoochee WPCP was taken offline from February 28, 2013 to March 3, 2013 and as a result an estimated 19,150,000 gallons of raw sewage was discharged to the Withlacoochee River; and

WHEREAS, on March 19, 2013, EPA and EPD held a teleconference to discuss the City's response to EPA's October 23, 2012 Section 308 information request and corrective actions to address the City's sanitary sewer system issues; and

WHEREAS, on April 10, 2013, the City submitted to EPD a document titled "Corrective Action Plans and Schedules" which includes completion dates for corrective actions within the City's sanitary sewer collection system and relocation of the Withlacoochee WPCP (see Attachment 6); and

WHEREAS, on April 11, 2013, following review of the City's response to the Section 308 information request, EPA submitted to EPD via electronic mail comments regarding the City's "Sewer Overflow Response and Reporting Procedures" (see Attachment 5a); and

WHEREAS, on April 15, 2013, the City submitted via electronic mail a list of sanitary sewer projects completed by the City from 2009 to present with a total expenditure amount of \$49,453,784 (see Attachment 7), including the renovation and expansion of the Mud Creek WPCP, which was completed in April 2012; and

WHEREAS, on April 23, 2013 the City submitted via electronic mail an interim plan for meeting permit compliance at the existing Withlacoochee WPCP; and

WHEREAS, according to the City, on April 25, 2013, the Mayor and City Council adopted a five (5) year action plan to address the City's sanitary sewer system issues, including the relocation of the Withlacoochee WPCP; a new force main to the Withlacoochee WPCP; an equalization basin; a new headworks facility at the Withlacoochee WPCP; inspection of all sewer lines and manholes with associated repairs; and short term improvements to the existing Withlacoochee WPCP; and

WHEREAS, on September 11, 2013 the City transmitted to EPD via electronic mail a revised "Sewer Overflow Response and Reporting Procedures" in response to EPA's and EPD's comments (See Attachment 5b); and

WHEREAS, Part II.A.1. of the Permits requires the permittee to maintain and operate as efficiently as possible all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with the permit; and

WHEREAS, Section 12-5-29(a) of the Georgia Water Quality Control Act (Act) makes it unlawful to use any waters of the State to dispose of sewage or other wastes, except in such a manner as to conform and comply with the Code and all rules, regulations, orders, and permits established under the Code; and

WHEREAS, Section 12-5-23(c)(12) of the Act provides the Director the authority to issue orders as may be necessary to control, abate, and prevent pollution of the waters of the State; and

WHEREAS, Section 12-5-52(a) of the Act specifies that any person violating the Code or any permit condition or limitation established pursuant to the Code shall be liable to the State of Georgia for a civil penalty not to exceed \$50,000 per day for each day during which such violations continue; and

WHEREAS, the spills and Permit violations addressed in this Order are violations of the Permits, Rules, and Act.

# NOW THEREFORE, the Director ORDERS and the City AGREES as follows:

- 1. Allocate, at a minimum, \$200,000 to complete a Supplemental Environmental Project (SEP). The SEP must go beyond standard compliance requirements and should result in improvement to water quality or water conservation. Any proposed SEP should not be part of a plan or requirement that the City is already in the process of implementing or that is otherwise required in order to comply with the Georgia Water Quality Control Act. Within sixty (60) days of the execution date of this Order, submit to EPD for review and approval a SEP plan and schedule with a completion date no later than December 31, 2016. Once approved by EPD, the SEP plan and schedule will become part of the Order.
- Complete the relocation of the Withlacoochee WPCP in accordance with the construction deadline as described in Action Item 1a and 1b in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the interim plan for meeting permit compliance at the existing Withlacoochee WPCP, submitted to EPD on April 23, 2013.
- 4. Complete Action Item Nos. 2-5 in accordance with the completion deadlines listed in Attachment 6 of this Order.
- Upon EPD written approval, immediately implement the revised "Sewer Overflow Response and Reporting Procedures", submitted to EPD via electronic mail on September 11, 2013.
- Submit to EPD semi-annual progress reports for the SEP listed in Condition 1
  this Order, and action items listed in Attachment 6 of this Order, by June 30<sup>th</sup>
  and December 31<sup>st</sup> of each year.

- 7. Consistent with timely review and approval by EPD, all plans, procedures, and schedules required by or referenced in this Order, are upon approval by EPD, incorporated into this Order. The City shall implement all approved plans, procedures, and schedules.
- 8. Upon receipt of any report, plan, or schedule; or any portion of a report, plan, or schedule; or any revised report, plan, or schedule; or any revised portion of a report, plan, or schedule; or any written response (hereinafter collectively "document") required under this Order, EPD shall review said document to determine its completeness with regard to the Act, Permit, and this Order. If EPD determines that said document is complete, EPD shall notify the City in writing that said document is approved. If EPD determines that said document is incomplete. EPD shall provide the City with written notice of any deficiencies. The City shall have sixty (60) days from receipt of the written notice of deficiencies to submit a modified document to EPD unless otherwise specified by EPD. Should the City take exception to all or part of EPD's notice of deficiencies, the City shall, within fifteen (15) days after receipt of the written notice of deficiencies, submit to EPD a written statement of the grounds for the exception. EPD and the City shall confer by telephone or in person in an attempt to resolve any disagreement. If agreement is reached, the resolution shall be written and signed by representatives of each party. If agreement cannot be reached within thirty (30) days from the date of the City's receipt of the notice of deficiencies unless otherwise specified by EPD, the City shall revise the document as required by EPD and resubmit the revised document in accordance with a schedule to be specified by EPD

This Order does not waive EPD's authority to take further enforcement action, or imply

that EPD will not take such action, if the City (1) fails to meet applicable Permit effluent limits, (2) or the City does not fully satisfy the conditions of the Order, or (3) fully comply with other relevant requirements.

This Order is not a finding, adjudication of, or evidence of a violation of any State law by the City nor does the City by its consent agree to any violations of State laws nor admit any liability to any third party or parties.

This Order does not relieve the City of any obligation or requirements of the Permits.

This Order is final and effective immediately, and shall not be appealable, and the City waives any hearing on its term and conditions.

It is so ORDERED, CONSEN	NTED, and AGREED TO this day of _	<u></u>
2013.		
FOR THE DIVISION:		
	Judson H. Turner	
	Director	•
FOR THE CITY:	BY (print name)	
		×.
	SIGNATURE	
•		,
	TITLE:	b. a at
	. DATE:	5

### GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### ATTACHMENT 1

Permit Effluent Limitation Violations
Withalcoochee WPCP (GA0033235) and Mud Creek WPCP (GA0020222)
January 2008 to July 2013

### City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

### Withlacoochee WPCP GA0033235

·			
Parameter	Date I	Permit Limit	Reported Value
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Feb-08	1706	1970
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-08	30	44.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-08	45	141
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-08	1365	2458
Total Suspended Solids Weekly Maximum Loading, kg/Day	Feb-08	1706	
Total Suspended Solids Percent Removal	Feb-08	85%	
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-08	1706	
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-08	400	1041
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Aug-08	379	623
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	1137	
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-vo	1137	1311
Dissolved Oxygen Minimum, mg/L	Apr-09	5.0	3.0
Total Suspended Solids Weekly Maximum Concentration, mg/L	Apr-09	45	59.6
Total Suspended Solids Weekly Maximum Loading, kg/Day	Apr-09	1706	3355
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Apr-09	400	
	•		
Ammonia Weekly Maximum Concentration, mg/L	May-09	6.4	7
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Jan-10	853	970
Total Suspended Solids Weekly Maximum Concentration, mg/L	Jan-10	45	
Total Suspended Solids Weekly Maximum Loading, kg/Day	Jan-10	1706	3396
Ammonia Weekly Maximum Concentration, mg/L	May-10	6.4	15.7
Ammonia Weekly Maximum Loading, kg/Day	May-10	204	366
, J	, <b>.</b>		
Ammonia Monthly Average Concentration, mg/L	Aug-11	2.0	2.9
Ammonia Weekly Maximum Concentration, mg/L	Aug-11	. 3.0	4
Ammonia Weekly Maximum Loading, kg/Day	Aug-11	76.0	80.1
1			
Ammonia Weekly Maximum Concentration, mg/L	Sep-11	3.0	3.6
	6.1.40		
Ammonia Weekly Maximum Concentration, mg/L	Jul-12	3.0	3.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Sep-12	4.0	4.4
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Sep-12	6.0	
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Sep-12	152	
Ammonia Weekly Maximum Concentration, mg/L	Sep-12	3.0	
	•	400	
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Sep-12	400	457.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Oct-12	4.0	4.5
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Oct-12	6.0	
Ammonia Weekly Maximum Concentration, mg/L	Oct-12	3.0	(
Ammonia Weekly Maximum Loading, kg/Day	Oct-12	76	*
Antitiona Weekly Maximum Loading, kg/Day	OUG 12	70	00.0

### City of Valdosta Permit Effluent Limitation Violations January 2008 to July 2013

Withlacoochee WPCP GA0033235, cont.			
Development	Data Dar	maid Limeid Dam	and and Malicia
Parameter pH Minimum, S.U.	Jan-13.	mit Limit Rep 6.0	4.5
pri winimum, 5.0.	Jan-15.	0.0	, 4.5
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-13	30	67.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-13	45	98.3
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-13	1365	2476.0
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Mar-13	1706	3542.6
Total Suspended Solids Weekly Maximum Concentration, mg/L	Mar-13	45	149.4
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-13	1706	14624
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-13	400	35283
Somethin Woodly Mazamani Goombano Modify or or 100 mz	mar 10	,00	, 00233
Mud Creek WPCP GA0020222			
INING OFFICE AND OFFIC			
Parameter.	Date Per	mit Limit Rep	orted Value
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	458	654
, other dasponated construction, manners according, manners			
Effluent Flow Monthly Average, MGD	Jan-10	3.22	3.23
Effluent Flow Monthly Average, MGD	Mar-10	3.22	3.3
	101011		
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Oct-10	400	1158
Ammonia Monthly Average Concentration, mg/L	Nov-10	1.5	3.8
Ammonia Weekly Maximum Concentration, mg/L	Nov-10	2.25	12.2
	Nov-10.	18	60.6
Ammonia Monthly Average Loading, kg/Day	Nov-10. Nov-10	23	108.6
Ammonia Weekly Maximum Loading, kg/Day	1404-10	23	100.0
Effluent Flow Monthly Average, MGD	Feb-11	3.22	3.3
			,
Effluent Flow Monthly Average, MGD	Mar-11	3.22	3.3
Effluent Flow Monthly Average, MGD	Mar-12	3.22	3.3
Effluent Flow Weekly Maximum, MGD	Mar-12	4.03	4.8
Endonchion violity maximum, mod	77124.		
Effluent Flow Monthly Average, MGD	Mar-13	3.22	3.3
Effluent Flow Weekly Maximum, MGD	Mar-13	4.03	6.2
Effluent Flow Monthly Average, MGD	Jul-13	3.22	3.4

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### **ATTACHMENT 2**

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAÚSE
	TRIBUTARY TO JOREE MILL POND	Particle with 1997 and any 1997 and any 1997 and	1	HEAVY RAIN, PRESSURE ALSO CAUSED FAILURE TO
2008-02-21	TO TWO MILE BRANCH	817 GORNTO ROAD	6,000	PREVIOUS SEWER REPAIR
	STILLHOUSE BRANCH TRIB TO			
2008-02-21	WITHLACOOCHEE RIVER	3500 COUNTY CLUB ROAD	6,000	HEAVY RAINFALL
	DUKES BAY CANAL TRIBUTARY TO	- Company	Constitution of the Consti	
2008-02-21	MUD CREEK	108 TUCKER ROAD	18,000	HEAVY RAINFALL
2008-02-21	KNIGHTS CREEK	1001 PONDEROSA DRIVE	22,000	HEAVY RAINFALL
2008-02-22	TWO MILE BRANCH	608 HOWELL BROOK DRIVE	35,000	OVERLOAD DURING HEAVY RAIN
2008-08-23	KNIGHTS CREEK	1001 PONDEROSA DRIVE	24,000	INFLOW
2008-11-30	WITHLACOOCHEE RIVER	HIGHWAY 133 @ I-75 EXIT 18	135,000	HEAVY RAINFALL
2009-02-19	TRIBUTARY TO CHERRY CREEK	LAKE LAURIE DRIVE	500	SANITARY OVERFLOW/ ELECTRICAL PUMP FAILURE
2009-04-03	SUGAR CREEK	2408 MEADOWBROOK DRIVE	10,001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2310 PARK LANE	10,001	EXCESSIVE RAIN
2009-04-03	ONE MILE BRANCH	1212 WAINWRIGHT DRIVE @ OLD SUGAR CREEK WWTP	10,001	EXCESSIVE RAIN
2009-08-13	SUGAR CREEK	1314 BAYTREE ROAD	18,900	MANHOLE FALLEN INTO STREAM
2009-08-18	UNNAMED TRIBUTARY	KINDERLOU LIFT STATION	5,500	ELECTRICAL- DUE TO SCADA FAILURE
2009-08-26	DUKES BAY CANAL	210 DAMPIER STREET	3,000	GREASE BLOCKAGE
2009-11-11	SUGAR GREEK	1825 NORMAN DRIVE	14,000	BLOCKAGE OF GREASE AND RAGS
2009-11-18	ONE MILE BRANCH	1409 NORTH ASHLEY STREET	7,500	STORM WATER PIPE BROKE SEWER LINE

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY	RÉPORTED CAUSE
2009-12-02	TWO MILE BRANCH	2408 NORTH PATTERSON	9,000	GREASE BLOCKAGE
2009-12-02	SUGAR CREEK	1825 NORMAN DRIVE	6,000	BLOCKAGE IN SEWER MAIN
2009-12-03	SUGAR CREEK	1815 NORMAN DRIVE	9,999	BLOCKAGE AND EXCESSIVE RAIN
2009-12-08	MUD CREEK	MUD CREEK WWTP	550,000	COLLAPSED MANHOLE
2009-12-09	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/EXCESSIVE RAIN/CLOGGED PUMPS
2009-12-10	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/HEAVY RAINS/CLOGGED PUMPS
2009-12-11	MUD CREEK	MUD CREEK WWTP	1,350,000	DAMAGED MANHOLES
2009-12-12	MUD CREEK	MUD CREEK WWTP	950,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-13	MUD CREEK	MUD CREEK WWTP	350,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-22	SUGAR CREEK	1825 NORMAN DRIVE	14,000	GREASE AND RAGS
2010-01-21	TRIBUTARY TO KNIGHTS CREEK	1001 PONDEROSA DRIVE	12,100	INFLOW AND INFILTRATION (I&I), HEAVY RAIN
2010-01-21	DUKES BAY	700 ROGERS STREET	600	I&I, HEAVY RAIN
2010-01-21	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	138,000	I&I, HEAVY RAIN
2010-01-21	TRIBUTARY TO AN UNNAMED STREAM	700 CYPRESS STREET	64,000	I&I, HEAVY RAIN
2010-01-21	SUGAR CREEK	2408 MEADOWBROOK DRIVE	450,000	I&I, HEAVY RAIN
2010-01-21	DUKES BAY	400 SOUTH OAK STREET	6,000	I&I, HEAVY RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-01-21	TRIBUTARY TO TWO MILE BRANCH	817 GORNTO ROAD	20,350	I&I, HEAVY RAINS
2010-01-25	DUKES BAY CANAL	701 CYPRESS STREET	34,000	MANHOLE COLLAPSED
2010-04-04	TWO MILE BRANCH	2408 NORTH PATTERSON STREET	4,000	GREASE BLOCKAGE
2010-04-18	TRIBUTARY TO KNIGHTS CREEK	1201 PONDEROSA DRIVE	500	GREASE BLOCKAGE
2010-04-29	DUKES BAY CANAL	TUCKER ROAD	3,000	LINE BLOCKAGE
2010-06-14	DUKES BAY CANAL	613 SOUTH PATTERSON STREET	3,240	BROKEN PIPE
2010-09-27	ONE MILE BRANCH	212 EAST COLLEGE STREET	1,100	1&1
2010-09-29	SUGAR CREEK	1423 GORNTO ROAD	75,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TRIBUTARY TO KNIGHTS CREEK	1003 PONDEROSA DRIVE	27,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	ONE MILE BRANCH	212 EAST COLLEGE STREET	6,000	I&I DUE TO EXCESSIVE RAIN
2011-01-18	TRIBUTARY TO CHERRY CREEK	4036 BEMISS ROAD	27,000	GREASE BLOCKAGE
2011-02-07	THREE MILE BRANCH	825 NORTHWOOD PARK DRIVE	187,660	COLLAPSED SEWER
2011-10-12	TWO MILE BRANCH	2501 NORTH PATTERSON STREET @ PENDLETON DRIVE	500	GREASE BLOCKAGE
2011-10-13	TRIBUTARY TO LAKE SHERI	1307 NORTH SAINT AUGUSTINE ROAD	4,600	RAG BLOCKAGE

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2011-11-29	SPRINGHOUSE CREEK	3350 PLANTATION DRIVE	9,000	BYPASS PUMP HOSE CONNECTION FAILURE
2012-03-03	CHERRY CREEK	4119 BEMISS ROAD BEMISS ROAD PUMP STATION	24,000	PUMP STATION OVERLOADED BY HEAVY RAINS
2012-03-03	SUGAR CREEK	2412 MEADOWBROOK DRIVE	12,000	HYDRAULIC OVERLOAD
2012-03-08	TRIBUTARY TO KNIGHTS CREEK	301 SOUTH BLANCHARD STREET	189,000	COLLAPSED SEWER MAIN
2012-06-05	TWO MILE BRANCH	NORTH ASHLEY STREET	1,800	SEWER BROKEN BY CONTRACTOR
2012-06-26	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,000	EXCESSIVE RAIN FROM TROPICAL STORM DEBBY
2012-07-11	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,000	EXCESSIVE RAIN
2012-08-07	CHERRY CREEK	4119 BEMISS ROAD	1,000	LEAKING PUMP
2012-08-16	WITHLACOOCHEE RIVER	EXIT 18 @ HIGHWAY 133	2,500,000	PUMP STATION FAILURE
2012-08-16	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,500,000	BOTH PUMPS AT PUMP STATION FAILED
2013-02-21	KNIGHTS CREEK	3891 INNER PERIMETER ROAD	20,000	GREASE BLOCKAGE
2013-02-25	CHERRY CREEK	4119 BEMISS ROAD	173,000	HYDRAULIC OVERLOAD
2013-02-25	SUGAR CREEK	626 SCOTT DRIVE	720,000	EXCESSIVE RAIN
2013-02-25	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,290,000	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	ROUSE ROAD	590,500	EXCESSIVE RAIN
2013-02-25	TWO MILE BRANCH	2420 MEADOWBROOK DRIVE	936,000	EXCESSIVE RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2013-02-25	TWO MILE BRANCH	817 GORNTO ROAD	53,750	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	1248 NORTH LEE STREET	19,200	EXCESSIVE RAIN
2013-02-25	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST	124,500	EXCESSIVE RAIN
2013-02-26	ONE MILE BRANCH	JOREE STREET	29,000	EXCESSIVE RAIN
2013-02-28	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,750,000	I&I, FLOODING FROM RAIN
2013-03-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	I&I, EXCESSIVE RAIN
2013-03-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	EXCESSIVE RAIN
2013-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,400,000	EXCESSIVE RAIN
2013-03-04	DUKES BAY CANAL	1810 SOUTH PATTERSON STREET	100,000	RUPTURED SEWER MAIN
2013-03-24	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST OF WITHLACOOCHEE RIVER BRIDGE	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1423 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	2412 MEADOWBROOK DRIVE	360,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	626 SCOTT DRIVE	300,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1404 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-07-22	TWO MILE BRANCH	2400 NORTH PATTERSON STREET	2,050	GREASE
2013-07-31	SUGAR CREEK	2400 MEADOWBROOK DRIVE	2,000	POSSIBLE BLOCKAGE, UNDER INVESTIGATION

	ing managan katalang managan katalang katalang di katalang katalang katalang katalang katalang katalang katala I	aliantika katata a taman ka mija di mananin saran mining kanta a acampun da a a acampun di kata di agung Taman kanta di katan di mining kanta di kanta d	Markanan milit i Milia terit madan ingga dita atma didan parip alikina dan didam. Malikina inay ini pamadan ar mati manasi na	one and the second section of the second	and the first consistency and the second and analysis and the second and the seco
2013-07-31	HIGHTOWER CREEK	600 SCOTT DRIVE	2,000 POSSIBLE BL	OCKAGE	

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta.

### **ATTACHMENT 3**

EPD Fish Kill Investigations November 20, 2009 and February 22, 2013 Fish Kill Investigation: One Mile Branch In Lowndes County, Georgia On November 20, 2009

> By Jeremy Wixson

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region
Fitzgerald, Georgia

November 24, 2009

On Thursday November 19, 2009 at 3:45 p.m., Bill Noelle (404-362-2624) of Georgia EPD telephoned the Bowen's Mill Office to notify us of a fish kill in the city of Valdosta in Lowndes County Georgia. Marty Snowden took the call and linked me in the field to let me know. I was planning to sample fish that night and was not able to get to Valdosta before dark. I telephoned Bill Noelle and left a message for him on Friday November 20, 2009. I then telephoned John Waite (229-292-0842 cell, jwaite@valdostacity.com), Environmental Manager with the City of Valdosta. John informed me that there had been a break in a wastewater line that occurred in the Coca-Cola Bottling Plant parking lot. The leak was first discovered by a work detail cleaning One Mile Branch. The City dispatched utility crews to determine the cause and make repairs to the line. It was an 8-inch vitrified clay pipe and the water in it was coming from businesses in the area including a large laundromat. They discovered the broken pipe on Wednesday November 18, 2009. To fix the pipe, they dammed up One Mile Branch just below the site the wastewater was entering the branch, and used a gasoline pump to pump the water back into the sewage system. They estimated that approximately 7,500 gallons was discharged to the Branch before they got the pump in place. On Thursday November 19, 2009, Utility Department staff was checking the Branch downstream of the break and noticed some dead fish in One Mile Branch. They called EPD, who in turn called us. Bill Noelle indicated that EPD staff would be investigating on November 20, 2009 as well.

Edward Zmarzly and Jeremy Wixson went to the location of the fish kill on November 20<sup>th</sup> and took water quality measurements at the North Lee Street crossing (Figure 1, WQ station 1) at 1230 hours, at the break site (Figure 1, WQ station 2) at 1244 hours, and at the Williams Street Crossing (Figure 1, WQ station 3) at 1348 hours. Water was flowing slowly in the branch, and in all locations live fish were observed. We then went to the site of the broken sewer line and began counting the fish observed according to species and size, working our way downstream until we no longer observed dead fish. The kill area was spread out from the location of the broken sewer line (Figure 1, purple marker by WQ station 2) to 0.69 miles downstream on the Valdosta State University Campus (Figure 1, purple marker between WQ stations 3 and 4). When we finished taking inventory of the dead fish, we went downstream to take a final set of water quality readings at the West Gordon Street Crossing (Figure 1, WQ station 4) at 1610 hours. We were unable to determine if the fish kill was a direct result of the broken pipe's effluent or from installation of a temporary dam used to catch the effluent.

We measured basic water quality with a YSI model 550 oxygen meter and a Hach portable water test kit model FF-1 (Table 1). Dissolved oxygen was lowest at the WQ station 1, which was a little shallower and slower moving than the other stations. The pH was highest at the location of the sewage line break (WQ station 2), but had become more neutral by the time it reached WQ station 3.

In total we found 510 dead fish with a total value of \$186.45 (Table 2), there was one crayfish also dead in the area. The cost of investigating the fish kill (Table 3) was \$1,215.99. The total value of the fish kill including the cost of investigation and the value of the fish killed was \$1,402.44.

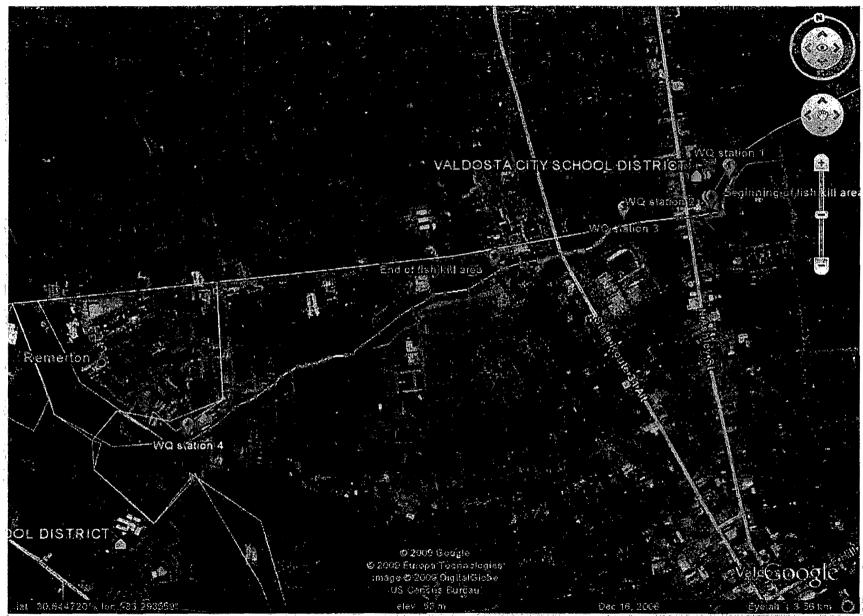


Figure 1. Map of One Mile Branch area of fish kill investigation.

Table 1. Water quality measurements made during the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Station Number and Location	Time (hrs)	Depth (ft)	Temperature (°C)	DO (ppm)	pН	Hardness (ppm)	Alkalinity (ppm)	Dead Fish
1. N Lee Street 30.84862° N 83.27824° W	1230	Surface	16.1	3.3	7	48	12	NO
2. Marion Street 30.84755° N 83.27940° W	1244	Surface	21.7	5.5	9	60	24	YES
3. Williams Street 30.84748° N 83.28365° W	1348	Surface	16.3	4.2	6.5	44	24	YES
4. W Gordon Street 30.84041° N 83.30654° W	1610	Surface	17.5	8.15	6.5	36	24	NO

Table 2. Number and monetary value of dead fish from the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Species	Number of Dead Fish	Value (in dollars) <sup>a</sup>
American Eel Anguilla rostrata	**************************************	2.37
Golden Shiner Notemigonus crysoleucas	35	7.75
Bullhead Catfish  Ameiurus spp.	62	68.56
Mosquitofish Gambusia spp.	196	25.48
Bluegill  Lepomis macrochirus	156	54.55
Redbreast Sunfish Lepomis auritus	59	27.44
Spotted Sunfish Lepomis punctatus	1	0.30
Total	510	186.45

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

Table 3. Costs for the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Item	Amount	Cost (\$)
Personnel <sup>a</sup>		
PS: Nat Res Biologists (WL)	20 hours	584.00
TS: Natural Resources Tech (AL)	21 hours	506.94
Vehicles		
1297.72	191 miles	105.05
Other		
Supplies	1 set	20.00
Total		\$1215.99

<sup>&</sup>lt;sup>a</sup> Cost includes fringe benefits

### REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water: Latitude-Longitude)					MAJOR RIVER BASIN		R RIVER BASIN
One Mile Branch (Tributary to Withlacoochee River) 30.84755					3.27940° W	Suw	annee
NEAREST TOWN				COUNT	Y DATE OF H		OF KILL
Valdosta				Lowr	ndes	Nove	ember 18, 2009
TYPE OF WATER BODY				DURAT	ION OF KILL (If know	/n)	
⊠ RIVER OR STREAM □ LA	AKE/POND	Ο.	ESTUARY '	DAYS/H	iours <b>Severa</b>	l hour	S
PC	OLLUTI	ON S	OURCE - TY	PE O	F OPERATION	ON	
AGRICULTURAL OPERATION	NS		INDUSTRI	AL OPER	ATIONS		MUNICIPAL OPERATIONS
☐ MANURE DRAINAGE, ENSILAGE ☐ ME LIQUORS, OR FEED LOT OPERATIONS ☐ RUI ☐ HANDLING OF EQUIPMENT AND ☐ CHI			DD & KINDRED TALS BBER & PLASTICS EMICALS TROLEUM	☐ LEATHER & LEATHER ☐ REFUSE DISPOSE PRODUCTS ☐ WATER SYSTEM ☐ PAPER & ALLIED ☐ SWIMMING POOR PRODUCTS ☐ POWER SYSTEM			SEWERAGE SYSTEMS  ☐ REFUSE DISPOSAL ☐ WATER SYSTEM ☐ SWIMMING POOL ☐ POWER SYSTEM ☐ PEST CONTROL ☐ OTHER
TRANSPORTATION OPERATION	ONS	·		OTHER	egga, success tata and a successful successf	90 <del>-</del>	
☐ RAIL ☐ TRUCK ☐ BARGE (☐ AIR ☐ PIPELINE ☐ OTHER	OR BOAT		NGEMENT/ENTRAINNISTRUCTION	MENT/DAM DESIGN UNKI			UNKNOWN
SPECIFIC POLLU	SPECIFIC POLLUTANT OR FACTOR CHANGING WATER CHARACTERISTIC						
☐ NUTRIENTS ☐ RADIONUCLEIDES ☐ TEMPERATURE ☐ CYANIDES AND PHENOLS	RADIONUCLEIDES PETROLEUM (OIL & GREASE) PESTICIDES, HERBICIDES, ETC. TURBIDITY TEMPERATURE SEDIMENTATION/SILTING MIXED CHEMICALS SUNKNOWN						. TURBIDITY
EXTENT OF AREA AFF	ECTED	The state of the s	ESTIMATED OR A				l KILLED (If known)
MILES OF STREAM ACRES OF LAKE 510			510 – direct count		American Eel, Golden Shiner, Bullhead spp., Mosquitofish, Bluegi Redbreast Sunfish, Spotted Sunfish		
SEVERITY VALUE OF FISH K							
ADDITIONAL REMARKS (Include effects on other than fish, e.g., shellfish, waterfowl, etc.) Saw one dead Crayfish.							
INVESTIGATOR MAILING ADDRESS AND PHONE NUMBER					IUMBER	1 mm v	DATE OF REPORT
Jeremy Wixson Fitzgerald, GA 31750 229-426-5272					. ,		November 24, 2009
EPD FOLLOW-UP INVESTIGATION F	EPD FOLLOW-UP INVESTIGATION REFERRED TO: ACTIONS TAKEN (If known) (EPD) WQMU (EPD)					WQMU (EPD)	



MARK WILLIAMS COMMISSIONER DAN FORSTER DIRECTOR

March 11, 2013

EPDIMPEIMRP

MAR 1 3 2015

RECEIVED

**MEMORANDUM** 

TO:

Jane Hendricks

EPD - Wastewater Regulatory Program

Marzieh Shahbazaz

EPD - Permitting, Compliance, and Enforcement

FROM:

Matt Thomas

Assistant Chief of Fisheries

SUBJECT:

Fish Kill - Knights Creek

Lowndes County, Georgia

February 22, 2013

Attached is copy of subject fish kill investigation report for your files. Please call me if you have questions.

:mt

cc: John Biagi
Bert Deener

Attachment

### Fish Kill Investigation in Knights Creek In Lowndes County, Georgia February 22, 2013

by Bryant Bowen

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region IV
Waycross, Georgia

February 26, 2013

Chad Sexton received notification of a fish kill in Knights Creek, Lowndes County on February 22, 2013 around 0945 hours from John Waite (229.292.0842) of Valdosta Water and Sewerage Department resulting from a sewage spill. The spill reportedly started around 2130 hours on February 20, 2013. The city located the spill at 1030 hours February 21, 2013 near the Chadwyck subdivision and repaired the overflowing manhole around 1430 hours. Mr. Waite reported an estimated 20,000 gallons of sewage spilled. Mr. Waite also reported that the department flushed the canal, with treated water, overnight using a nearby fire hydrant. Valdosta Water and Sewerage Department personnel picked up and iced around 30 dead fish on February 21, 2013. After receiving all pertinent information from Mr. Waite and gathering necessary equipment and additional staff, Jason Mitchell and Chad left Waycross to investigate.

Chad and Jason arrived at 1230 hours at the intersection of Inner Perimeter Road and Tyndall Dr. near the origin of the spill (Fig. 1). At this point, it started raining and continued to rain throughout the investigation. Mr. Waite met Chad and Jason around 1315 hours at Site #1 (Fig. 1) and reported that EPD had already been contacted. He relayed the spill history and actions taken by his department and handed over the previously collected dead fish. Based on Mr. Waite's information, there was nowhere to take water quality above or near the spill origin, which was a clogged manhole that overflowed municipal sewage into a ditch with little water in it. Here they encountered the remnants of the spill: the smell of raw sewage and visual debris. They measured basic water quality at all of the rest of the sites using a YSI model 85 oxygen/conductivity meter, a Hach portable water test kit model FF-1, and a YSI model 60 pH meter. They noted that the total hardness and specific conductance readings were elevated at the first site and dropped as they moved downstream. At the time of the investigation, none of the water quality readings were at levels typically capable of killing fish. Water temperatures dropped as they moved downstream, likely because of the heavy rainfall.

Jason and Chad counted and/or collected every visible dead fish between the spill origin and Site #2 (Jaycee Shack Road) but were unable to collect dead fish between Sites #2 and #3 due to lack of access, deeper water, and an impenetrable understory. Therefore, the number of dead fish was estimated using an expansion factor. The expansion factor was determined by dividing the total number of segments by the number of segments in which fish were collected. In this case, we had 5 total segments and were able to collect fish from 2 of those. This provided us with an expansion factor of 2.5.

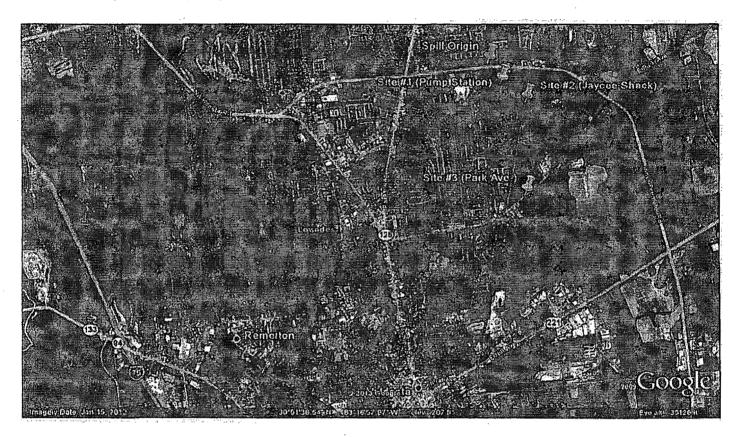
They observed no live fish at any of the 3 sites, mainly because of the reduced visibility caused by the heavy rainfall. The water quality at the last site had improved and no dead aquatic organisms were detected within 200 ft. upstream of Park Avenue. Therefore we determined this was the terminus of the 1.58 mile long fish kill. It was at this point that the field investigation ended. Due to heavy rainfall, Chad and Jason returned to the Waycross Regional Fisheries Management Office to work up all collected dead fishes with Bert Deener.

The initial cause of the fish kill appears to be an oxygen depletion caused by overloading of nutrients from raw sewage into Knights Creek. The system was also flushed with treated city drinking water from a fire hydrant. The total estimated number of fish killed was 469, and the value of these fish was \$219.59 (Table 2). Additionally, 17 crayfish and 16 bullfrog tadpoles were killed. The cost of the investigation was \$845.36 (Table 3). The total cost of the dead fish and the investigation was \$1064.95.

### REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water: Latitude-Longitude)					MAJOR RIVER BASIN		
Knights Creek					Alap	aha / Suwanee	
NEAREST TOWN				COUNTY D		DATE OF KILL	
Valdosta			Lown	des	2/20	- 2/21/2013	
TYPE OF WATER BODY	•		DURATI	ON OF KILL (If know	/n)	March a region of species of a linear growth of the species of the	
☑ RIVER OR STREAM ☐ LAKE/PO	OND	ESTUARY	DAYS/H	ours ~ 18 h	rs.		
POLL	UTION S	OURCE - TY	PE O	F OPERATION	NC	e version of	
AGRICULTURAL OPERATIONS		INDUSTRI	AL OPER	ATIONS		MUNICIPAL OPERATIONS	
☐ MANURE DRAINAGE, ENSILAGE PR LIQUORS, OR FEED LOT OPERATIONS ☐ ME ☐ HANDLING OF EQUIPMENT AND ☐ RUI CONDITIONS ☐ CHI		D & KINDRED		journe en 1983.	SEWERAGE SYSTEMS  □ REFUSE DISPOSAL  □ WATER SYSTEM □ SWIMMING POOL □ POWER SYSTEM □ PEST CONTROL □ OTHER		
TRANSPORTATION OPERATIONS  RAIL TRUCK BARGE OR BO AIR PIPELINE OTHER		OTHER  INGEMENT/ENTRAINMENT/DAM DESIGN NSTRUCTION □ OTHER				□ UNKNOWN	
SPECIFIC POLLUTA	SPECIFIC POLLUTANT OR FACTOR CHANGING WATER CHARACTERISTIC						
					TURBIDITY UNKNOWN Tine poisoning from flushing		
TO THE TO DESCRIPTION OF THE PROPERTY OF THE P		J:				And the second s	
EXTENT OF AREA AFFECTED MILES OF STREAM ACRE 1.58 mi	S OF LAKE	estimated or a number killed 469	Lake chubsucker, Warmouth, Spott			Varmouth, Spotted	
SEVERITY  TOTAL HEAVY MOD	∐LIGHT	VALUE OF FISH K \$219.59	The same of the sa			erel, Redbreast Inidentified sunfish, Jespotted sunfish, pminnow, Swamp	
ADDITIONAL REMARKS (Include effects on other than fish, e.g., shellfish, waterfowl, etc.)  The spill killed other aquatic organisms besides fishes including: 17 Crayfish, 16 Tadpoles,							
Chad Sexton Way	STIGATOR MAIL Box 2089 (cross, GA 2)285-6094	A 31502		UMBER	ant large w	DATE OF REPORT 2/26/2013	
EPD FOLLOW-UP INVESTIGATION REFER	RED TO:	ACTIONS TAKEN (If	known) (E	(PD)		WQMU (EPD)	

Figure 1. Map of study area for the fish kill investigation on Knights Creek in Valdosta, Lowndes County, GA on February 20-22, 2013.



30°52'58.91"N	83°15'29.50"W
	02 12 27,00
30° <b>52</b> '46.42"N	83°15'22.86"W
30°52'33.77"N	83°15'8.27"W
30°51'40.78"N	83°15'16.42"W
	30°52'33.77"N

Figure 2. Photo of manhole that was the spill origin (photo taken on February 22, 2013)



Figure 3. First road culvert holding water near spill origin (taken on February 22, 2013).

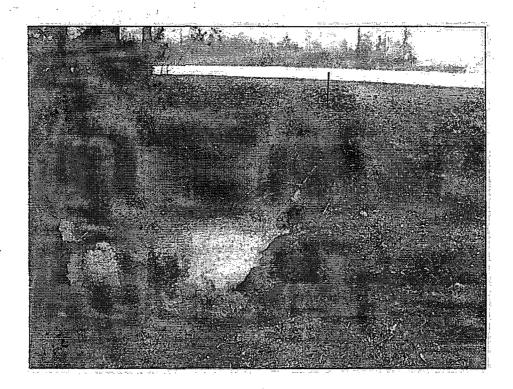


Table 1. Water quality measurements made during the fish kill investigation on Knights Creek in Lowndes County February 22, 2013 including GPS coordinates.

Station name or location	Time (hrs)	Water depth (ft)	Water Temp (°C)	D.O. (ppm)	рН	Total hardness (ppm)	Total alkalinity (ppm)	Specific conductance (µs)	Dead fish	GPS coordinates
Site # 1 (Pump Station)	1350	Surface	18.5	5.6	6.2	154	68	306	Yes	30°52'46.42"N 83°15'22.86"W
Site #2 (Jaycee Shack) Road	1430	Surface	16.4	6.1	6.1	68	34	252	Yes	30°52'33.77"N 83°15'8:27"W
Site # 3 (Park Avenue)	1536	Surface	15.4	7.01	6.1	68	68	91	No	30°51'40.78"N 83°15'16.42"W

Table 2. Number and monetary value of dead fish from the fish kill investigation in Knights Creek, Lowndes County, on February 20 - 22, 2013.

Species	Number of dead fish b	Value (\$) a/b		
Lake chubsucker	26	21.85		
Erimyzon sucetta	20	21.03		
Flat bullhead	33	25.00		
Ameiurus platycephalus	33	25.00		
Western mosquitofish	8	1.04		
Gambusia affinis	<b>o</b>	1,04		
Redbreast sunfish	225	75.75		
Lepomis auritus		75.75		
Warmouth	40	16.23		
Lepomis gulosus	40	10.23		
Bluegil1	10	3.15		
Lepomis macrochirus	10	3,13		
Spotted sunfish	68	21.36		
Lepomis punctatus	. 00	21.50		
Largemouth bass	15	24.58		
Micropterus salmoides		21.30		
Redfin pickerel	10	1 <b>5</b> .97		
Esox americanus	•	1015		
Chain pickerel	3	4.29		
Esox niger	J	>		
Goldfish	5	2.05		
Carrassius auratus auratus	· ·	-1,95		
Bluespotted sunfish		,		
Enneacanthus gloriosus	3	0.81		
Lined topminnow		0 **4		
Fundulus lineolatus	. 5	0.54		
Swamp darter	4.0	4.00:		
Etheostoma fusiforme	10	4.22		
Brook silverside	•	0.75		
Labidesthes sicculus	3	0.75		
Unidentified sunfish	0	• • •		
	8	2.00		
Total	469	\$219.59		

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

b Expanded value = number counted multiplied by an expansion factor.

The expansion factor = total number of segments/number of segments sampled = 5/2 = 2.5

Table 3. Costs for the fish kill investigation on the Knights Creek in Lowndes County from February 20-22, 2013.

	101 1 102 1 2 4 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
<u>Item</u>	Amount	Cost (\$)
Personnel a		,
Fisheries Biologist I	8 hours	\$233.53
Fisheries Technician III	12 hours	\$314.04
Fisheries Technician II	8.5 hours	\$194.57
Regional Supervisor	1 hour	\$38.22
Vehicles		
129823	130 miles	\$65.00
Total		\$845.36

<sup>&</sup>quot; Values include fringe benefits.

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### ATTACHMENT 4

City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 1, 2008 to July 31, 2013

## City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEGIÑ DATE	WATERWAY IMPACTED	ÖVERFLOW LOCATION	QUANTITY REPORTED CAUSE
2008-01-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,473,000 HYDRAULIC OVERLOAD, CAUSED BY RAIN
2008-02-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, INFLOW AND INFILTARION (I/I) DURING WEEK 7,700,000 OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2008-02-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 15,500,000 5" on 2/21 and 2" on 2/22
2008-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 15,200,000 5" on 2/21 and 2" on 2/22
2008-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 16,400,000 5" on 2/21 and 2" on 2/22
2008-04-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	HEAVY RAIN CAUSED HIGH PEAK FLOW LEADING TO 10,600,000 HYDRAULIC OVERLOAD OF SECONDARY CLARIFIERS
2008-08-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,200,000 HYDRAULIC OVERLOAD
2008-08-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16,900,000 HYDRAULIC OVERLOAD
2008-08-26	MUD CREEK	1638 NEW STATENVILLE ROAD	6,300,000 HYDRAULIC OVERLOAD FROM TROPICAL STORM FAY
2008-11-29	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,500,000 I&I, HEAVY RAINFALL
2009-01-27	MUD CREEK	1638 NEW STATENVILLE ROAD	2,700,000 CLOGGED ACTIVATED SLUDGE TUBES
2009-03-31	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,800,000 HIGH SOLIDS IN EFFLUENT FLOW AND EXCESSIVE RAIN
2009-04-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	18,300,000 EXCESSIVE RAIN
2009-04-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	24;800,000 FLOODING
2010-01-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,400,000 I&I, HEAVY RAIN
2010-01-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	14,900,000 INFLOW FROM HEAVY RAIN

## City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to July 2013

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY REPORTED CAUSE
2010-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,000,000 INFLOW FROM HEAVY RAIN
2010-03-11	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,200,000 INFLOW FROM HEAVY RAIN
2010-04-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	5,900,000 BIOLOGICAL UPSET OF SECONDARY TREATMENT SYSTEM
2011-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,100,000 RAIN INDUCED, HYDRAULIC PROBLEM AT PLANT
2011-02-10	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,300,000 HYDRAULIC OVERLOAD
2011-02-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,825,000 MECHANICAL FAILURE
2012-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,380,000 HYDRAULIC OVERLOAD OF WPCP SECONDARY SYSTEM
2013-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,047,000 HYDRAULIC OVERLOAD
2013-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	11,673,000 HYDRAULIC OVERLOAD
2013-02-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,173,000 EXCESSIVE RAIN
2013-07-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,600,000 HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-24	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,950,000 HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,500,000 HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,000,000 HYDRAULIC OVERLOAD, EXCESSIVE RAIN
2013-07-30	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,200,000 HYDRAULIC OVERLOAD, EXCESSIVE RAIN

### GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### ATTACHMENT 5a

EPA Comments of the City's Sewer Overflow Response and Reporting Procedures
April 11, 2013

### **ATTACHMENT 5b**

The City of Valdosta's revised Sewer Overflow Response and Reporting Procedures September 11, 2013

EPA Comments on Sewer Overflow Response and Reporting Procedures: City of Valdosta – Response to 10/23/2012 Section 308 Request (Attachments E and F)

#### Standard Operating Procedure (Attachment E)

- 1. Section II.A.1. If the crew confirms an overflow is occurring, then the start time recorded should be the initial time reported, or earlier if there is credible testimony, and not the time that the overflow was discovered by the crew. This should also be reflected in the process diagram.
- 2. Section II.A.5. Additional instruction concerning the perspective(s) and settings for the photographs is likely needed to ensure photos are taken that are of use in making estimations.
- 3. Section II.A.6. Additional instruction concerning procedure for measurements is likely needed to ensure measurements are obtained accurately.
- 4. Section II.A.9. Identification of the name of the waters is also necessary for reporting purposes.
- 5. Section II.B.2. Additional instruction concerning how to document causal observations is likely needed to ensure the information collected has consistent specificity.
- 6. Section III.D. Washing down the area after application of the disinfectant could still result in pollutants to the storm drain. Quarantining and collecting the wash water, or instructing that no wash water is to be directed or drained to the storm drain may be a prudent addition.
- 7. Section IV. Direction regarding how to respond and communicate back-ups to basements or homes due to the sewer overflow conditions is needed.
- 8. Section IV. Direction regarding how to record and communicate sewer overflows that do not reach waters of the state is needed.
- 9. Process diagram. Start time of overflow should be specified as noted above. More than one picture may be taken.

#### Methods of Estimation

The two page document (Attachment F) offers insufficient instruction for performing the estimations of discharge. Valdosta needs to formalize its techniques and attach instruction to the standard operating procedure.

### Standard Operating Procedure Sanitary Sewer Overflow Response and Reporting

The purpose of this document is to establish a standard procedure for responding to and reporting sanitary sewer overflows from the City of Valdosta collection system. All sanitary sewer overflows require immediate response to stop the overflow and secure the affected area to protect public health. All overflows must be investigated to determine the cause and any contributing factors. Finally, all overflows must be documented to fulfill regulatory requirements and to provide information for future collection system improvements and repairs. Any sanitary overflow that allows untreated wastewater to enter waters of the state must be reported to the Environmental Protection Division (EPD), to the local media, and to the health department as required under the Georgia Rules for Water Quality Control section 391-3-6-.05 Emergency Actions.

### I. Definitions:

### "Major Spill" means:

- 1. The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit for biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids.
- 2. Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water quality violations in the waters of the State.

"Spill" means any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to waters of the state.

"Waters of the State" means any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation. (O.C.G.A. 12-5-22)

### II. Identification of sanitary sewer overflow:

A. When a report of an overflow is received a utilities department crew must be dispatched to confirm that an overflow does exist. If the report is received after normal working hours the standby crew must respond. Upon locating and confirming the overflow the responders must follow procedures to document the overflow and aid in determining the extent of the overflow. Supervisors responding to the overflow will be able to help collect information and will make sure that all needed information is gathered.

- 1. Record the date and time the overflow began. This will be the time the initial report was received, or earlier if there is credible testimony to support the earlier time.
- 2. Report the overflow to the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager.
- 3. Advise the Collections Supervisor or standby supervisor of conditions and what equipment may be needed to stop the overflow
- 4. Check downstream manholes to determine if there is a blockage and to identify the approximate position of any blockage.
- 5. Document the overflow with pictures before removing the manhole cover, these pictures will be used to help estimate the rate of flow. When taking pictures of the overflow:
  - a. Use a digital camera on automatic settings
  - b. The camera must be set to the correct date and time, the date stamp option must be on so that the date will appear on the picture
  - c. Take at least one picture from the side of the manhole with a ruler in place to display the height of the sewage coming from the vents or around the manhole frame. If there are multiple vents discharging then more than one picture should be taken measuring the height of flow at different locations along the arc of the manhole cover.
  - d. Take one picture from above the manhole lid to document the number of vents releasing sewage or the percentage of the frame involved in the overflow.
  - e. Takes pictures of the sewage stream leaving the manhole, any ponds or pools of sewage for documentation. The size of these pools will be measured to estimate the volume in the pool.
- 6. Document information necessary to help determine the volume of the overflow. Since the conditions at each overflow will be different, there is no single method of determining total volume of sewage discharged that will be appropriate for all events. One or more of the following methods will be used. Appendix 1 contains detailed instructions for determining total volume.
  - i. For overflows from a manhole with the lid still in place, measure the depth of the spout of water at the rim or at the pick holes. Make a note of the depth measurement and where it was taken. Using a clock face record the areas overflowing and the measured height of the water at each five minutes of circumference. (Example: height of 1 inch from 1:00 to 2:00, height of ½ inch from 2:00 to 3:00, etc.
  - ii. For contained overflows map the containment area and measure the wetted area, including depth measurements.
  - iii. For runoff in a defined channel such as against a curb measure the width of the channel, the average depth, and the velocity of flow.
- 7. Follow the sewage stream to determine if the sewage is reaching waters of the state or entering the storm sewer system
- 8. Document any place sewage is entering waters of the state or the storm sewer system with pictures

- 9. Make a note of the point that the sewage is entering waters of the state or the storm sewer system as closely as possible using temporary markers or by noting landmarks. The name of the waterway receiving the discharge must be recorded for proper reporting.
- 10. Inform the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager of any entry into state waters.

### B. When the overflow has been stopped:

- 1. The responders must document the time that the overflow stopped. This information is required for reporting to the state. In addition, the rate of the overflow in gallons per minute and the duration of the overflow in minutes may be used to estimate the total volume released in gallons.
- 2. The responding crews will make on site observations to help determine the cause of the release. The crew should write on the work order form any physical indicators found such as rags, grease, broken pipe, dirt, bricks, etc. If any pictures can be taken of debris removed from the manhole or line, then these pictures will be helpful in determining the cause of the overflow. All such pictures should be taken using a digital camera in automatic mode with the date stamp turned on. A yardstick or ruler should be laid next to the debris to provide a size reference.

#### III. Site Cleanup

- A. Collect as much of the sewage as possible using the vacuum truck
- B. Gather and remove sewage related debris and organic solids from the area.
- C. Using a solution of household chlorine bleach, such as Clorox or Purex, spray the affected area. Let the disinfectant remain in place for at least one-half hour. Recommended dosage of chlorine bleach is ¾ cup of liquid bleach to 50 gallons of water or 1 tablespoon of liquid bleach to five gallons of water.
- D. Wash down the area. Wash water applied after disinfection could still carry pollutants to the storm sewer system or a stream, therefore wash water must be directed away from any storm system inlet. Pools of wash water should be recovered using the vacuum truck.

### IV. Reporting of overflows, spills, and major spills:

A. All overflows should be reported to the Environmental Manager so that a record can be kept of the location, amount, and cause of the overflow. Overflows that do not reach waters of the state will be on record with the Utilities Department. Any customers whose property is affected by the overflow should be told of the event and of all cleanup actions that have been done or are planned.

- B. If sewage does reach the waters of the state then reporting to the EPD is required, along with public notification. The required actions are listed in the Georgia Rules for Water Quality Control; section 391-3-6-.05 Emergency Actions.
  - 1. In the event of a spill: (less than 10,000 gallons released to waters of the state and no water quality violation)
    - a. The City must notify the EPD immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
    - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.
    - e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.

- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- 2. In the event of a "major spill" (over 10,000 gallons released or a water quality violation occurs) the same responses are required with some extra requirements.
  - a. The City must notify the EDP immediately by telephone or by FAX. Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
    - 1. Date of the spill;
    - 2. Location and cause of spill;
    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
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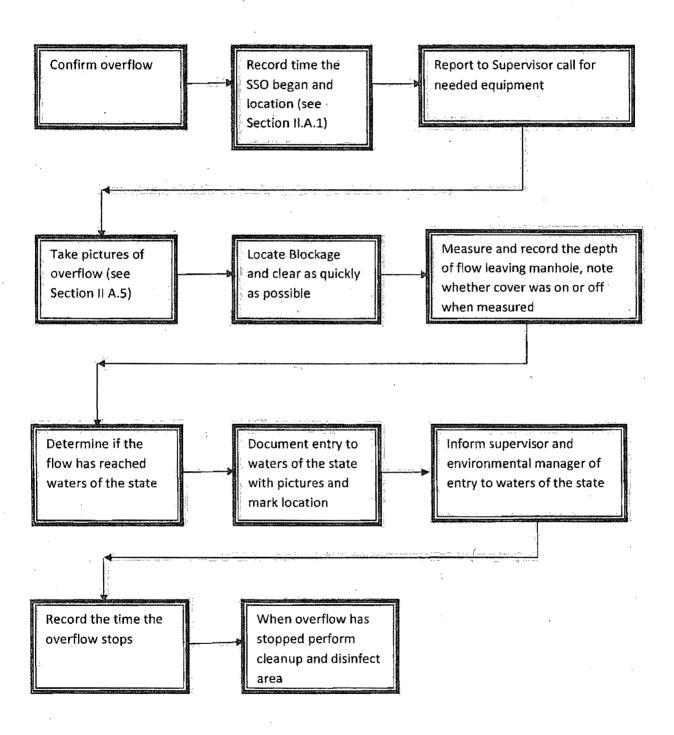
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- g. The City must publish a notice of the major spill in the Valdosta Daily Times within seven days. The notice must include the items required in the initial report to EPD. Normally the Public Information Officer will arrange the public notice using a copy of the press release.
- h. The City must immediately begin a sampling program for the waterway affected by the major spill. Sample sites are selected upstream and downstream of the major spill site and are monitored for dissolved oxygen, temperature, pH, and fecal coliform. The Environmental Manager's staff will be responsible for selecting sites, collecting samples, and performing on site tests.
- C. Responding to backups to homes resulting from sanitary sewer overflows
- D. Recording of overflows that do not reach waters of the state
  - The Environmental Manager will maintain records of all sanitary sewer overflows whether or not there is discharge to the waters of the state. Therefore, all overflows must be reported to the Environmental Manager. In the event that the position of Environmental Manager is eliminated from the department organizational structure, the maintenance of overflow records will be reassigned by the Utilities Director, and the Standard Operating Procedure updated to reflect this change.
  - 2. The following information will be recorded for overflows that do not reach waters of the state:
    - a. Date and time the overflow began
    - b. Date and time the overflow ended
    - c. Location of the overflow
      - i. By address if one exists for the location
      - ii. By Latitude and Longitude if no address exists
      - iii. By manhole identification number if a manhole is involved
      - iv. By upstream and downstream manhole identification numbers is a pipe break is involved

- d. Cause of the overflow
- e. Volume discharged
- f. Volume recovered
- g. Final disposal of recovered sewage
- h. Description of cleanup
- E. Responding to backups that enter homes
  - 1. The following information will be recorded for overflows that enter houses
    - a. Date and time of the backup
    - b. Address of the house
    - c. Name of the resident and owner
    - d. Cause of the overflow
    - e. Volume discharged
    - f. Volume recovered
    - g. Final disposal of recovered sewage
    - h. Description of cleanup
  - 2. The collection system supervisor or crew leader will contact the Utilities Office Coordinator to report a backup into a residence
  - 3. The Utilities Office Coordinator will arrange for professional cleaning services for the residence
  - 4. The resident or home owner will be provided information on procedures for filing a claim

# City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date:		
Type of Occurrence:		,
Date of Spill:		. ,
Time Started or identified:		
Time Stopped:		
Location:	11 111111 10 10 10 10 10 10 10 10 10 10	
Amount:		•
Did spill reach "Waters of the State"?		
Receiving water:	· ·	
Cause:		
Corrective Action:	(e)	
Upstream sampling site will be:	·····;	
Downstream sampling site will be:	<del>di</del> gi.	•
Reported by:	·	
Contact number:	,	

# Sanitary Sewer Overflow Response Process



# Spill Documentation and Spill Volume Calculation Guidance

# **D.1** Spill Documentation

Upon initial discovery of a spill, utility personnel should document and record the following information:

- Date;
- Time (based on best professional judgment, estimate the start time of the overflow prior to initial discovery or establish the start of the spill at the time of receipt of a customer service request reporting of a spill);
- Description of spill.
- Where it started;
- Where the spill discharged to (describe the nearest receiving water body and conduct a visual inspection for signs of algae, rags, raw sewage, and debris; also inspect and describe immediate upstream and downstream areas);
- Determine time period of long term spill events (evidence such as algae growth indicates a long term spill and it is estimated that algae growth occurs after one month of exposure to sewage); and
- Estimate volume since discovery of the spill.
- Use photographs to document all information possible.

# D.2 Spill Volume Calculation

The following sections provide guidance for estimating spill flow volume for manholes, broken pipes, wet weather, and pump station outage. This is provided as guidance only however, if a different method is used to calculate spill volume, that method should be validated and described.

#### D.2.1 Broken Lines

Table D-1 provides Spill Volume Calculation by Flow Rate for different size pipes,

VERSION 4/18/2006 D-2

#### SANITARY SEWER FLOW RATES FOR SPILL DETERMINATIONS.

Depth of Flow (Inches)	Pipe Size									
								24	30	
1	15	20	25	30	35	40	45	50	100	
2	50	60	70	80	85	95	105	125	145	
3	90	110	125	135	150	175	185	210	230	
4 . •	125	160	180	200	235	260	285	320	350	
5	155	190	240	280	315	360	380	445	470	
6	180	260	310	355	415	455	500	555	630	
7	lange et e	290	370	425	495	570	620	695	770	
8		320	430	500	600	680	760	815	1010	
9		1	465	575	690	800	890	965	1260	
10	\$ 10	i i i i i i i i i i i i i i i i i i i	490	625	775	905	1005	1120	1360	
11				685	870	1020	1135	1275	1490	
12			Trikingerine.	715	935	1130	1260	1410	1630	
13	i,			5	1020	1240	1415	1580	1870	
14				i man mang.	1070	1345	1520	1690	2110	
15				.   2.544 - 44	1105	1425	1650	1850	2220	
16				2 200 00		1495	1760	1990	2560	
17	2					1550	1880	2110	2730	
18	Fig					1595	1980	2285	2940	
19	The same of the sa			**************************************	St. sugge		2050	2410	3100	
20							2115	2530	3330	
21		- And Lore					2160	2630	3510	
22						2 Processing	7. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	2700	3780	
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and the same of the same				i.	- <del> </del>				4320	
			1						4370	
·			<u> </u>	77					4400	

Gallons per Minute @ V=2.0 feet per second (ft/sec) and n=0.013; Adjust accordingly for flat or steep sloped sewers.

VERSION 4/18/2006

#### SPILL CALCULATION PROCEDURES

- Determine and record the time of initial caller notification of sewer spill.
- Measure and record the flow in inches immediately downstream of spill or blockage and determine flow rate in gallons per minute (gpm) using table above. Record the pipe size in inches.
- 3. Clear obstacles from blocked sewer, allow free and steady flow to stabilize. Note time the flow stabilizes.
- 4. Measure the depth of flow in inches in the previously blocked sewer and determine flow rate from table above.
- 5. Subtract the flow rate from the downstream sewer determined in 2 above from the flow rate from the previously blocked sewer determined in 4 above and multiply the result by the elapsed minutes from notification to clearance.
- 6. Report total amount spilled to Supervisor or Superintendent

#### SEWER OVERFLOW AND SPILL PROCEDURES

- 1. 99% of all visible debris should be removed from the site.
- 2. Areas where sludge is pooled should be pumped back into sewer.
- 3. Site should be raked and limed to neutralize sludge accumulations.
- 4. Deodorant should be applied to neutralize odor problems.
- Areas below where spill entered stream should be checked for visible debris or sludge on banks.
- Crew Chief should document on Work Order extent of cleanup completed and note whether repeat visits for additional lime applications are needed.
- Crew Chief should insure that Supervisor or Superintendent has notified the GA
   EPD (during normal duty hours) or that Dispatch has notified GA EPD (during offduty hours). Telephone notification is required with backup letter report.
- 8. If spill has occurred at a national park, National Park Service also should be notified using same procedures as noted above.
- 9. Supervisor or Superintendent should insure that spill location is entered into the GIS database.
- 10. Superintendent and Division Manager should identify repeat locations and develop plan to eliminate further spills at these locations.

## D.2.2 MANHOLE OVERFLOWS (Adapted from Guidance from GA EPD)

The following guidance can used in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used. The following manhole SSO quantification methods are provided as guidance.

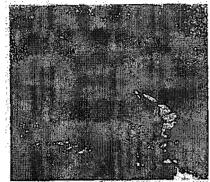
VERSION 4/18/2006 D4

### D.2.2.A Estimating Spill Flow rates for overflowing manholes

This is a visual estimating method. Please refer to Exhibit D-2 for the Reference Sheet. Source: City of San Diego Metropolitan Wastewater Department.

Exhibit D-2

City of San Diego Metropolitan Wastewater Department

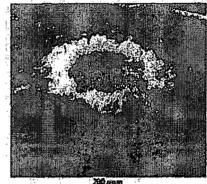


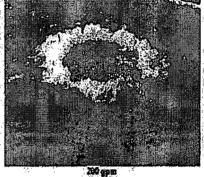
Reference Sheet for Estimating Sewer Spills from Overflowing Sewer Manholes
All estimates are calculated in gallons per minute (gpm)

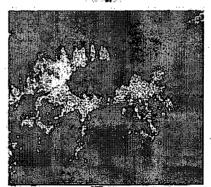


Wastewater Collection Division (619) 654-4160











225 qpm

All photos were taken during a demonstration using metered water from a hydrant in cooperation with the City of San Diego's Water Department.

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.rec 4.99

#### D.2.2.B Volume of SSO at Manhole

Length x Width x Depth x 7.48 = gallonsSpill area = 20 feet by 30 feet = 600 sq. ft. Depths of spill = 3 inches = 0.25 feet Volume =  $20 \times 30 \times 0.25 \times 7.48 = 1,122 \text{ gallons}$ 

#### D.2.3 WET WEATHER OVERFLOW CALCULATION:

The following can be used to help in estimating the rate of loss of flow out of manholes. As this is an estimate, judgment by the observing person and/or estimator must always be used.

All calculations are based on an estimate of the size of the opening involved, the velocity of flow through the opening, and the duration of time the overflow occurred. In most all occurrences, the opening size and velocity will change over an event from low to high back to low. Judgment on an average condition must thus be attempted to reach a realistic rate of loss.

#### D.2.3.A. Loss through vent holes

Size of opening:

Assume holes at 1- inch diameter

Area = (number of holes) ( $\pi$ ) (D<sup>2</sup>/4) (1ft<sup>2</sup>/144) Area = (number of holes) (3.14) (1/4) (1/144)

Area =  $(number of holes) (0.0055ft^2/hole)$ 

#### 2. Velocity Plume Guide

Velocity through holes, based on Velocity Head = (Velocity<sup>2</sup>/2g)

Plume height	Velocity
1-inch	2.0 ft/sec
2-inch	3.3 ft/sec
3-inch	4.0 ft/sec
4-inch	4.6 ft/sec
5-inch	5.2 ft/sec
6-inch	5.7 ft/sec

#### 3. Time = convert to minutes

Volume (Gal.) = (Area) (Velocity) (Time) (448 gpm/cfs)

Example:

Top with six hole, flow through holes makes a one-inch high plume,

last for 4 hours, 15 minutes

Volume =  $(6 \text{ holes } \times 0.0055 \text{ ft}^2/\text{hole}) (2\text{ft/sec}) (255 \text{ min}) (448 \text{ gpm/cfs})$ Volume = (0.033) (2) (255) (448) = 7540 gallons

#### D.2.3.B. Loss around edge of non-vented cover

#### 1. Size of opening:

As the weight of manhole lid will generally hold it in place until internal pressures exceed 0.4 pounds/sq. in., loss occurs through imperfections, grit, etc. between the lid and manhole frame. Observations are generally a vertical ring of water from side gap between the lid and frame of approximately ¼ inch width.

Area = 
$$(\pi)$$
 (D) (¼ inch) (1/12 in/ft)  
= (3.14) (2ft) (1/4) (1/12)

Area =  $0.131 \text{ ft}^2$ 

#### 2. Velocity through gap

(see vertical plume guide above, D.3.A.2.)

#### 3. Time - convert to minutes

Example: Manhole with 4-inch plume around edge for 2 hours, 15 minutes

#### D.2.3.C. Loss from tilted cover

#### 1. Size of opening:

Some estimate has to be made in the field concerning how much gap exists in order to do this calculation. For the following amounts of lift of one side, the areas are as follows:

A = 
$$(\pi)$$
 (D) (in of lift)  $(1/12 \text{ ft/in})$   $(1/2)$   
A =  $(3.14)$  (2ft) (in. of lift)  $(1/12)$   $(1/2)$   
A =  $0.262$  (in. of lift)

I	Lift (inches)	Area (ft²)
	1 1	0.262
Ì	2	0.524
Ī	3	0.786
	4	1.048

#### 2. Velocity through opening

This must be estimated from visual observation. A low rate would be 2/ft/sec, moderate rate at 4 to 5 ft/sec, high rates up to 7 ft/sec. Over 7 ft/sec, the lid will

VERSION 4/18/2006 D-8

probably blow off the manhole. The gap (lift) will generally increase with higher velocity as well.

#### 3. Time – convert to minutes

Example:

Field observation of 2-inch gap and velocity of 4 ft/sec for a period of 3 hours, 30 minutes.

Volume (Gal.) = 
$$(0.524 \text{ ft}^2)$$
 (4ft/sec) (210min) (448)  
= 197,192 gallons

#### D.2.3.D. Loss from Manhole without a lid in place

If no cover exists, an estimate of the average height the water column (plume) extends above the top of the manhole frame must be made. Use the height to velocity estimate from (A) above to estimate the velocity. Be sure to adjust the height estimate downward for the affects of debris around the edge of the rim which will cause the height to be incorrectly high.

Area = 
$$(\pi)$$
  $(D^2/4)$  =  $(3.14)$   $(2^2/4)$  =  $3.14$  ft<sup>2</sup>

Velocity - from field observation of water column height

Time - convert to minutes

Example: inch

A manhole without a lid was observed to have an overflow with a 3 - high column of water for a period of 6 hours, 10 minutes

Volume (Gal.) = 
$$(3.14) (4.0 \text{ ft /sec}) (370) (448)$$
  
Volume =  $2,081,946 \text{ gallons}$ 

#### D.2.3.E. Other

- 1. Generally approach of estimating a cross sectional area where the flow is leaving and a velocity of flow can be used to determine a rate. This can be applied to any situation.
- Several observations over an event to estimate the area and velocity are better than a single observation. The overflow examples above assume a constant rate over the period which will estimate volumes too high. As an example, if an hour at the beginning and end of each event is assumed for the flow to build up from zero to maximum and back to zero, a calculation could be done as follows:

VERSION 4/18/2006 0-9

#### Example:

A manhole with a cover tilted open 2 inched with an estimated velocity of 4 ft/sec at its worst rate of loss for two hours and about 1-inch tilt with a velocity of 2 ft/sec observed at two other occasion over a 7 hour total event.

Worst case: 2 hours, 2 inched tilt, 4 ft/sec Other times: 1 inch tilt, 2 ft/sec, time unknown

Total overflow time: 7 hours

#### Divide total of 7 hours into several periods

· 1st hour:

Start to 1-inch tilt, 2 ft/sec

Volume (Gal.) = (Area) (Velocity) (Time)  $(448) \times 50\%$ = (0.262) (2) (60) (448) (0.50)=7.043 gallons

7th hour:

1-inch tilt, 2 ft/ sec down to end Same as above situation

Volume

= 7.043 gallons.

#### 5 remaining hours:

2 hours at 2-inch tilt, 4 ft/sec 3 hours at 1-inch tilt, 2 ft. sec

Volume = (0.524) (4 ft/sec) (120 min) (448) = 112,681 gallons

Volume = (0.262) (2 ft/sec) (180 min) (448) = 42,255 gallons

Event Total = 7,043 + 7,043 + 112,681 + 42,255 = 169,022 gallons

# GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

#### ATTACHMENT 6

Corrective Action Plans and Schedules Revised September 11, 2013

# Corrective Action Plans and Schedules

Action Item No.	Action Description	Completion Date
1a. (Phase 1)	Pump Station, Force Main, Headworks and Equalization Basin Project: Design and construct two new master pump stations, two smaller pump stations, a new force main, and a new headworks structure with grit removal and bar screens at the location of the	July 2016
,	existing Withlachoochee WPCP. Complete construction of a 6.0 MG equalization basin, which will be included at this site for initial wet weather flows and future flow equalization through the new treatment plant. The flow from this project will be gravity fed to the	,
	existing WPCP for final treatment and discharged utilizing the existing plant outfall. This project will replace an existing 54-inch gravity sewer main to the current plant as well as the existing	
	influent pump station, both of which are highly prone to severe inflow and flooding from the Withlachoochee River.	alleger and the second and the secon
1b. (Phase 2)	Relocation of Withlacoochee WPCP to new location 60 feet above current flood level: Complete construction of the relocated Withlacoochee WPCP. Upon completion, the relocated	August 2017
	Withlacoochee WPCP will continue to use the existing Withlacoochee WPCP outfall on the Withlacoochee River.	(Manufact)
2;	Collection System Evaluation Program: Complete a 5-year system wide plan to evaluate the entire sanitary sewer collection system (300 total miles of lines, with 75 miles already evaluated) and develop a schedule for repairs. The evaluation will include	December 2018
	the inspection of all manholes and collection system lines using smoke testing first to be followed by Closed Circuit Television (CCTV) Inspections of high priority areas. The evaluation will be utilized to prioritize and perform critical repairs and to plan and	
7 grant (1987) 188	prioritize major rehabilitation projects for the future. A schedule to complete major rehabilitation projects identified during the evaluation will be submitted for EPD approval by December 2018.	,
3.	Manhole Replacement/Rehabilitation Program: Continue implementing the existing program and complete the inspection of approximately 3,390 remaining manholes (2,610 inspected to date). Prioritize replacement or rehabilitation of the most deteriorated manholes. Complete the replacement or rehabilitation	December 2018
	of a minimum of 60 manholes each year until all Priority 1 manholes are completed. A schedule will be submitted to EPD for ongoing rehabilitation to address Priority 2, and all remaining manholes, on an annual basis.	
<b>4a</b> .	Lift Station Rehabilitation/Replacement Program: Continue implementing existing rehabilitation/replacement program until all existing older lift stations are rehabilitated or replaced. This will include connection to SCADA and/or auto-dialer systems, along with emergency power capabilities for connection to portable generators.	December 2018
4b.	Purchase Portable Generators for lift stations: The purchase of	December

	three portable generators will be completed (one per year, with the first generator purchased by December 2014) so that any existing lift stations not wired with two independent electric feeds can be connected to a portable generator for emergency power needs. In addition to the generators, the City will work with Godwin Pumps to meet emergency bypass pumping needs at each lift station whenever needed.	2016
5.	Ongoing Repairs to the Existing Withlacoochee WPCP: Ongoing repairs to the existing Withlacoochee WPCP will be conducted to maintain permit compliance until such time as the new treatment plant is brought online. Present repairs include new bar screens and temporary blower system.	August 2017
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### GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

### ATTACHMENT 7

Sanitary Sewer Projects Completed By the City From 2009 to Present April 9, 2013

No.	Project		Cost
1	CMMS for the Utility Department	\$	85,00
2	Mud Creek Emergency Manhole Repair	\$	103,00
⊈3.3°¦≤	Withlacoochee Biosolids Converyor Repair (FEMA)	*\$.	52,00
4	Withlacoochee Multi-Media Filters Repair (FEMA)	\$	46,00
5	Replacement of SO2 and CL2 systems (FEMA)	\$	82,700.0
6	Replacement of Reuse system controls (FEMA)	\$	13,377
7	Eectronics dryout and replacement of pannels; transformers; and misc components (FEMA)	\$	169,277.0
8	30% Design for Force Main, EQ Basin and Lift Stations	\$	100,0
9	CCVT Evaluation of Mud Creek and Knights Creek Trunk Lines	\$ \$	122,00
10	Cleaning of Withlacoochee Influent Pump Station Wet Well	\$	373,0
11	Rehabilitation of Four Problematic Lift Stations	80 <b>35</b> 230 <b>S</b>	1,500,00
12	Withlacoochee Nitrification Pump Replacement	\$	60,00
13	Withlacoochee Influent Pump Station Impeller Replacement	\$	90,00
14	Withlacoochee RAS Controller Replacement	\$	36,0
15	Thickener pump replacement	\$	53,068.
16	Valve actuators for liftstation	\$	8,369.
17	3 - 14hp Wilo pumps	\$	38,110.
18	RAS pump impellers	\$	33,642.
19	4 - 5hp submersible pumps	\$	20,154
12:0% 20	Phase 1 Manhole Rehabilitation	24428 <b>S</b>	205,0
21	Country Club Emergency Manhole Repair	\$	72,0
22	Withlacoochee Roughing Tower Controller Replacement	( <b>\$</b>	38,0
23	Purchase of 75-acres for Relocation of Plant	\$	1,012,5
24	Water and Sewer Rate Analysis	\$	50,0
25	Construction of Tucker Road Lift Station	\$	204,0
26	Withlacoochee Belt Press Major Repairs	Š	52,0
27 ·	Phase 2 Manhole Rehabilitation	\$	237.0
28	Goodyear Lift Station Rehabilitation	\$	104,0
29	CCTV work for Big County Lift Station Service Area	Q.	108,0
30	100% Design for Force Main, EQ Basin and Lift Station	\$	1,400,0
31	Withlacoochee Emergency Repairs for broken 20-inch Valve	\$	616,0
32 ×	一点,从中国的一个对抗,更是被抗躁的,但是这种,但是不是这种,就是是这种,就是这种,他们就是这种,我们就是这种的,是一个一个一个一个一个一个一个一个一个一个一个	e.	54,0
	The control of the co	q.	7
33	Blanchard Street Emergency Repairs		234,0
34	Temporary Bar Screens at Withlachoochee	∴\$ •	104,7
35	Temporary Blower System at Withlachoochee	\$	376,1
36	Projected Easement costs for force main project	\$	370,0
37	Recent emergency repairs at Withlachooche follow Flood	\$4 <b>\$</b>	203,2
38	Repair to Tucker Road Outfall	\$	27,4
40	Mud Creek WPCP Expamnsion and Upgrades	\$	41,000,0
	Total:	. \$	49,453,7



#### COMMUNICATION RECORD

To: Ryth Ann Phenis (850) 926-7755	From:	Brad Ammon! (404) 562-9769	Date/Time:	9/3/2013 3:30 PM
Subject: Controlled Con	respondence	(email to Prese	dent Obama)	
Valdosta, Gi	η (33 <b>0</b> 5 4 υ	~w(F)	ι.	
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### Phillips, David

From:

Jane Hendricks < Jane. Hendricks@dnr.state.ga.us>

Sent:

Friday, July 26, 2013 11:16 AM

To:

Phillips, David

Subject:

RE: Valdosta

Hi David,

The order has not been finalized. I'll try to remember to let you know when it goes on public notice.

Jane

From: Phillips, David [Phillips.David@epa.gov]

Sent: Thursday, July 25, 2013 3:59 PM

To: Jane Hendricks Subject: Valdosta

Hi Jane,

Hope all is well. Has Georgia EPD finalized its SSO action for Valdosta? I see that we received a draft in late May, but I don't have a final copy for our file.

David R. Phillips 404-562-9773

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#### Phillips, David

From:

Ammons, Brad

Sent:

Thursday, July 25, 2013 3:47 PM

To:

Phillips, David

Subject:

FW: pdf of City of Valdosta draft CO

Attachments:

Valdosta Draft CO.pdf

Print it out and put in file (I'll print Maurice's email and give to you).

#### **Brad Ammons**

**Environmental Engineer** Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F)

http://www.epa.gov/region4/water/wpeb/index.html

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From: Horsey, Maurice

Sent: Wednesday, May 29, 2013 7:39 AM

To: Ammons, Brad Cc: Diaz, Denisse

Subject: FW: pdf of City of Valdosta draft CO

#### Brad

Can you review this draft order from EPD. David did provide the state with comments. I'll find them and forward to you. Thanks

Maurice L. Horsey, 90

Maurice L. Horsey, IV | Chief Municipal & Industrial Enforcement Section Clean Water Enforcement Branch U.S. Environmental Protection Agency | Region IV Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

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From: Diaz, Denisse

Sent: Tuesday, May 28, 2013 9:30 AM

To: Horsey, Maurice

Subject: FW: pdf of City of Valdosta draft CO

Is David available to review this week? If not, can someone else review for him? Thanks!

DD

**From:** Jane Hendricks [mailto:Jane.Hendricks@dnr.state.qa.us]

Sent: Wednesday, May 22, 2013 3:43 PM

**To:** Diaz, Denisse; Horsey, Maurice **Cc:** Marzieh Shahbazaz; Kim Hembree

Subject: FW: pdf of City of Valdosta draft CO

Hi Denisse,

As discussed, attached is the Valdosta draft order for you to review before we send it to Valdosta. If at all possible, please review this within a week. We need to issue this order as soon as we can. Please feel free to call Marzieh Shahbazaz, Kim Hembree or me with any questions.

Thanks,

Jane

Jane Hendricks
Manager, Wastewater Regulatory Program
Watershed Protection Branch
Envronmental Protection Division
4220 International Parkway, Suite 101
Atlanta, GA 30354
Phone: 404 362 2616 Fax: 404 362 2691
jane.hendricks@dnr.state.ga.us

the rationale, and provide laboratory data demonstrating that the correct methodology was used.

E. Certain language in the GA EPD permit template does not correctly cite to federal regulations. This has been noted in a previous letter (July 11, 1997) from EPA to EPD, included in comments to the draft permit for the facility from the previous permit cycle (see attached). Please adjust the permit language to address these concerns.

GA EPD should continue to revise and improve their current draft NPDES permit template to include these and other comments. If you have any questions, please call me or have your staff contact Ms. Pamala Myers at (404) 562-9421.

Sincerely

Christopher B. Thomas

Chief

Municipal and Industrial NPDES Section

Water Protection Division

#### **Enclosures**

cc: Mr. Leon Weeks, Director of Utilities, City of Valdosta, GA

#### **Ammons, Brad**

From:

Jane Hendricks < Jane. Hendricks@dnr.state.ga.us>

Sent:

Monday, July 22, 2013 11:47 AM

To:

Ammons, Brad

Cc:

Marzieh Shahbazaz; Diaz, Denisse; Horsey, Maurice; Kim Hembree

Subject:

RE: pdf of City of Valdosta draft CO

Brad.

The order has not been finalized. Kim will send you a copy when it is.

Best regards,

Jane

From: Ammons, Brad [mailto:Ammons.Brad@epa.gov]

**Sent:** Monday, July 22, 2013 7:56 AM

To: Jane Hendricks

Cc: Marzieh Shahbazaz; Diaz, Denisse; Horsey, Maurice; Ammons, Brad

Subject: FW: pdf of City of Valdosta draft CO

Jane:

Has the Valdosta CO been finalized? If so, we would like a copy.

Thanks,

#### **Brad Ammons**

Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section
U.S. EPA Region 4
61 Forsyth St., SW
Atlanta, GA 30303
(404) 562-9769 (O)
(404) 562-9729 (F)
http://www.epa.gov/region4/water/wpeb/index.html

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From: Horsey, Maurice

Sent: Wednesday, May 29, 2013 7:39 AM

To: Ammons, Brad

Cc: Diaz, Denisse

Subject: FW: pdf of City of Valdosta draft CO

#### Brad

Can you review this draft order from EPD. David did provide the state with comments. I'll find them and forward to you. Thanks

Maurice L. Horsey, IV

Maurice L. Horsey, IV | Chief Municipal & Industrial Enforcement Section Clean Water Enforcement Branch U.S. Environmental Protection Agency | Region IV Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

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From: Diaz, Denisse

Sent: Tuesday, May 28, 2013 9:30 AM

To: Horsey, Maurice

Subject: FW: pdf of City of Valdosta draft CO

Is David available to review this week? If not, can someone else review for him? Thanks!

DD

From: Jane Hendricks [mailto:Jane.Hendricks@dnr.state.ga.us]

**Sent:** Wednesday, May 22, 2013 3:43 PM **To:** Diaz, Denisse; Horsey, Maurice **Cc:** Marzieh Shahbazaz; Kim Hembree

Subject: FW: pdf of City of Valdosta draft CO

Hi Denisse.

As discussed, attached is the Valdosta draft order for you to review before we send it to Valdosta. If at all possible, please review this within a week. We need to issue this order as soon as we can. Please feel free to call Marzieh Shahbazaz, Kim Hembree or me with any questions.

Thanks.

Jane

Jane Hendricks
Manager, Wastewater Regulatory Program

Watershed Protection Branch Envronmental Protection Division 4220 International Parkway, Suite 101 Atlanta, GA 30354

Phone: 404 362 2616 Fax: 404 362 2691

jane.hendricks@dnr.state.ga.us

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# Summary City of Valdosta Withlacoochee Water Pollution Control Plant (WPCP) NPDES Permit No. GA0033235 and Mud Creek WPCP NPDES Permit No. GA0020222

- The City of Valdosta (City) has reported seventy-eight (78) raw sewage spills from its sanitary sewer collection system to waters of the State from January 1, 2008 through April 30, 2013. In addition, the City reported twenty-six (26) major outfall spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules and Regulations of the State of Georgia for Water Quality Control (Rules), from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State from January 1, 2008 through April 30, 2013. Major outfall spills are discharges that exceed Total Suspended Solids and/or Biochemical Oxygen Demand permit limits by 50% or greater. The City also reported forty-eight (48) permit effluent limitation violations of Permit Nos. GA0033235 and GA0020222 from January 1, 2008 to March 31, 2013 and two fish kills.
- On March 31, 2009 the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City, an estimated 50,300,000 gallons of raw sewage was discharged to the Withlacoochee River from March 31, 2009 to April 2, 2009.
- In July 2009 the City applied for federal funding from the Federal Emergency Management Agency (FEMA) to secure funding for damages to the Withlacoochee WPCP from the flood of March 2009. On August 1, 2012, the City was denied federal funding from FEMA.
- On February 28, 2013, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City, an estimated 19,150,000 gallons of raw sewage was discharged to the Withlacoochee River from February 28, 2013 to March 3, 2013.
- The attached consent order (Order) addresses the above mentioned raw sewage spills, permit limitation violations, and deficiencies within the City's sanitary sewer collection system, and requires relocation of the Withlacoochee WPCP.
- The penalty amount has not been included in the Order, yet. The calculated penalty amount of the Order (\$462,787) does not include penalties for major spills as defined by 391-3-6-05(2)(b)(1) of the Rules. In addition, due to excessive flooding events, the calculated penalty amount does not include penalties for spills that occurred from March 31, 2009 to April 2, 2009 and from February 28, 2013 to March 3, 2013. Attached to this summary is a Comparable Actions list of similar consent orders.

# Georgia Department of Natural Resources Environmental Protection Division

2 Martin Luther King Jr., Dr., Suite 1152 Atlanta, Georgia 30334 Judson H. Turner, Director (404) 656-4713

May 14, 2013

Honorable John Gayle, Mayor City of Valdosta Post Office Box 1125 Valdosta, Georgia 31603-1125

RE: Proposed Consent Order

City of Valdosta

Withlacoochee Water Pollution Control

Plant

NPDES Permit No. GA0033235

Mud Creek Water Pollution Control Plant

NPDES Permit No. GA0020222

#### Dear Mayor Gayle:

A review of the Environmental Protection Division (EPD) files indicates that the City of Valdosta (City) has reported seventy-eight (78) raw sewage spills from its sanitary sewer collection system to waters of the State from January 1, 2008 through April 30, 2013. In addition, the City reported twenty-six (26) major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules and Regulations of the State of Georgia for Water Quality Control, from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State from January 1, 2008 through April 30, 2013. The City also reported forty-eight (48) permit effluent limitation violations of Permit Nos. GA0033235 and GA0020222 from January 1, 2008 to March 31, 2013.

On March 13, 2013 a meeting was held between the City and EPD to discuss corrective actions to address the City's unpermitted discharges and deficiencies in the City's sanitary sewer collection system. As discussed in the meeting, EPD has drafted the enclosed proposed consent order (Order).

If you agree with the terms and conditions of the Order, please sign and date the order in the signature block for the City and return it to this office within 30 days from receipt of this letter. Please do not place a date on the lines above the Director's signature block. These lines will be filled in when the order is executed.

If you have any questions, please contact Jane Hendricks at 404-675-6232. Your cooperation is appreciated.

Sincerely,

Judson H. Turner Director

JHT/kh Enclosure **ENVIRONMENTAL PROTECTION DIVISION** OF THE DEPARTMENT OF NATURAL RESOURCES

STATE OF GEORGIA

IN RE: CITY OF VALDOSTA

ORDER NO. EPD-WQ-

CONSENT ORDER

WHEREAS, the City of Valdosta (City) was issued National Pollutant Discharge

Elimination System (NPDES) Permit Nos. GA0033235 and GA0020222 (Permits) by the

Director of the Georgia Environmental Protection Division (Director, EPD) for its Withlacoochee

Water Pollution Control Plant (WPCP) and Mud Creek WPCP, respectively, located in the

Suwannee River Basin: and

WHEREAS, the Permits authorize the City to discharge treated wastewater according to

effluent limitations, monitoring requirements, and other conditions set forth in the Permits; and

WHERAS, from January 1, 2008 to March 31, 2013, the City reported forty-eight (48)

effluent violations of Permit Nos. GA0033235 and GA0020222 (see Attachment 1); and

WHEREAS, from January 1, 2008 through April 30, 2013, the City reported seventy-

eight (78) raw sewage spills from its sanitary sewer collection system to waters of the State

(see Attachment 2); and

WHEREAS, Chapter 391-3-6-.05(2)(a) of the Rules and Regulations of the State of

Georgia for Water Quality Control (Rules) defines a spill as "any discharge of raw sewage by a

Publicly Owned Treatment Works (POTW) to the waters of the State"; and

WHEREAS, Chapter 391-3-6-.05(2)(b)(2) of the Rules defines a major spill, in part, as

"Any discharge of raw sewage that (1) is in excess of 10,000 gallons or (2) results in water

quality violations in the waters of the State"; and

WHEREAS, the City reported two fish kill events downstream of the November 18, 2009

and February 21, 2013 spills; and

WHEREAS, on November 20, 2009 and February 22, 2013, the Wildlife Resources Division investigated the fish kill events (see Attachment 3); and

WHEREAS, from January 1, 2008 through April 30, 2013, the City reported twenty-six (26) major spills, as defined by 391-3-6-.05(2)(b)(1) of the Rules, from the Withlacoochee WPCP and the Mud Creek WPCP outfalls to waters of the State (see Attachment 4); and

WHEREAS, Chapter 391-3-6-.05(2)(b)(1) of the Rules defines a major spill, in part, as "The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit of biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day, provided that the effluent discharge concentration is equal to or greater than 25 mg/L for biochemical oxygen demand or total suspended solids" [amended August 2012]; and

WHEREAS, Chapter 391-3-6-.03(3)(I) of the Rules defines waters of the State as any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, wetlands, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation; and

WHEREAS, the spills to State waters documented in Attachments No. 1 and 2 of this Order meet the definition of a spill or major spill; and

WHEREAS, on March 31, 2009, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather, and according to the City's April 1, 2009 and April 14, 2009 letters, an estimated 50,300,000 gallons of raw sewage was discharged to the Withlacoochee River from March 31, 2009 to April 2, 2009; and

WHEREAS, on March 27, 2009, Governor Sonny Perdue declared Lowndes County to be in a State of Emergency due to heavy rains and severe weather; and

WHEREAS, on April 23, 2009, President Barack Obama declared South Georgia

counties, including Lowndes County, federal disaster areas; and

WHEREAS, in July 2009, the City applied for federal funding with the Federal Emergency Management Agency (FEMA) to secure approval of, and funding for, damages to the Withlacoochee WPCP from the flood of March 2009; and

WHEREAS, on December 7, 2009, the Mud Creek WPCP main manhole receiving all influent flow into the WPCP collapsed along with associated piping, and according to the City's December 14, 2009 report to EPD, an estimated 5,500,000 gallons of raw sewage spilled into Mud Creek from December 8, 2009 to December 13, 2009 spill; and

WHEREAS, in a letter to EPD, dated January 4, 2010, the City stated that during the December 8-13, 2009 major spill, a major leak was discovered by close circuit television equipment just downstream from one of the plugged influent lines, allowing significant groundwater inflow into the repaired manholes and lines; and

WHEREAS, on January 5, 2010, representatives of the City and EPD held a teleconference to discuss the City's sanitary sewer system; and

WHEREAS, during the January 5, 2010 teleconference, the City advised EPD of work completed on the sanitary sewer system and various initiatives put in place by the City since October 2008, and the City's commitment to continue to address its sanitary sewer system; and

WHEREAS, in a correspondence, dated January 6, 2010, the City submitted to EPD a Sanitary Sewer Condition Assessment and Rehabilitation Program, Condition and Criticality Report, and Sewer System Modeling and Capacity Evaluation Report (Assessment Program); and

WHEREAS, on April 6, 2010, representatives of the City and EPD held a teleconference to discuss clarification of the City's Assessment Program and to request the City to submit updated schedules for completion of specific sewer system projects; and

WHEREAS, on April 21, 2010, at the request of the City, representatives of the City and EPD met to further discuss corrective actions to address the City's sanitary sewer system, the amount of work the City has completed with regard to its sewer system, and the City's commitment to continue to address its sanitary sewer system; and

WHEREAS, on August 1, 2012, the City was denied federal funding from FEMA; and WHEREAS, in a letter dated October 23, 2012, the United States Environmental Protection Agency Region 4 (EPA) submitted a request to the City, under Section 308 of the Clean Water Act, for information regarding the Withlacoochee WPCP, the Mud Creek WPCP, and their associated sanitary sewer collection systems; and

WHEREAS, on February 28, 2013, the Withlacoochee WPCP was inundated with floodwaters due to heavy rains and severe weather; and

WHEREAS, in a letter to EPD, dated March 14, 2013, the City stated that due to the flooding on February 28, 2013 the Withlacoochee WPCP was taken offline from February 28, 2013 to March 3, 2013 and as a result an estimated 19,150,000 gallons of raw sewage was discharged to the Withlacoochee River; and

WHEREAS, on March 19, 2013, EPA and EPD held a teleconference to discuss the City's response to EPA's October 23, 2013 Section 308 information request and corrective actions to address the City's sanitary sewer system issues; and

WHEREAS, on April 11, 2013, following review of the City's response to the Section 308 information request, EPA submitted to EPD via electronic mail comments regarding the City's "Sewer Overflow Response and Reporting Procedures" (see Attachment 5); and

WHEREAS, on April 10, 2013, the City submitted to EPD a document titled "Corrective Action Plans and Schedules" which includes completion dates for corrective actions within the City's sanitary sewer collection system and relocation of the Withlacoochee WPCP (see Attachment 6); and

WHEREAS, on April 15, 2013, the City submitted via electronic mail a list of sanitary sewer projects completed by the City from 2009 to present with a total expenditure amount of \$49,453,784 (see Attachment 7); and

WHEREAS, Part II.A.1. of the Permits requires the permittee to maintain and operate as efficiently as possible all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with the permit; and

WHEREAS, Section 12-5-29(a) of the Georgia Water Quality Control Act (Act) makes it unlawful to use any waters of the State to dispose of sewage or other wastes, except in such a manner as to conform and comply with the Code and all rules, regulations, orders, and permits established under the Code; and

WHEREAS, Section 12-5-23(c)(12) of the Act provides the Director the authority to issue orders as may be necessary to control, abate, and prevent pollution of the waters of the State; and

WHEREAS, Section 12-5-52(a) of the Act specifies that any person violating the Code or any permit condition or limitation established pursuant to the Code shall be liable to the State of Georgia for a civil penalty not to exceed \$50,000 per day for each day during which such violations continue; and

WHEREAS, the spills and Permit violations addressed in this Order are violations of the Permits, Rules, and Act.

NOW THEREFORE, the Director ORDERS and the City AGREES as follows:

- Within thirty (30) days of the execution date of this Order, pay to the Georgia

  Department of Natural Resources \$\_\_\_\_\_ for the violations documented in this Order.
- Complete the relocation of the Withlacoochee WPCP in accordance with the construction deadline as described in Action Item 1a and 1b in Attachment 6

of this Order.

- 3. Within thirty (30) days from the execution date of this Order, submit an interim plan for meeting permit effluent compliance at the existing Withlacoochee WPCP. The interim plan must include methods for reducing the quantity of unpermitted discharges of partially treated effluent to State waters and reducing the quantity of permit effluent limitation violations.
- 4. Complete Action Item Nos. 2-5 in accordance with the completion deadlines listed in Attachment 6 of this Order.
- 5. Submit to EPD semi-annual progress reports for the action items listed in Attachment 6 of this Order by June 30<sup>th</sup> and December 31<sup>st</sup> of each year.
- 6. Within 60 days of execution date of this Order, address EPA's comments regarding the City's Section 308 information request response in Attachment 5 of this Order.
- 7. Upon the execution date of this Order, pay to the Georgia Department of Natural Resources a stipulated penalty of \$1,500.00 per month for each month, or portion thereof, that the City fails to implement or complete any action item in accordance with any approved schedule as required by this Order. A check in the penalty amount should be submitted to EPD by the 15<sup>th</sup> day of the month following the month in which the schedule milestone date(s) was missed
- 8. All plans, procedures, and schedules required by this Order are upon approval by EPD, incorporated into this Order. The City shall implement all approved plans, procedures, and schedules.
- 9. Upon receipt of any report, plan, or schedule; or any portion of a report, plan, or schedule; or any revised portion of

a report, plan, or schedule; or any written response (hereinafter collectively "document") required under this Order, EPD shall review said document to determine its completeness with regard to the Act, Permit, and this Order. If EPD determines that said document is complete, EPD shall notify the City in writing that said document is approved. If EPD determines that said document is incomplete, EPD shall provide the City with written notice of any deficiencies. The City shall have sixty (60) days from receipt of the written notice of deficiencies to submit a modified document to EPD unless otherwise specified by EPD. Should the City take exception to all or part of EPD's notice of deficiencies, the City shall, within fifteen (15) days after receipt of the written notice of deficiencies, submit to EPD a written statement of the grounds for the exception. EPD and the City shall confer by telephone or in person in an attempt to resolve any disagreement. If agreement is reached, the resolution shall be written and signed by representatives of each party. If agreement cannot be reached within thirty (30) days from the date of the City's receipt of the notice of deficiencies unless otherwise specified by EPD, the City shall revise the document as required by EPD and resubmit the revised document in accordance with a schedule to be specified by EPD

This Order does not waive EPD's authority to take further enforcement action, or imply that EPD will not take such action, if the City (1) fails to meet applicable Permit effluent limits, (2) or the City does not fully satisfy the conditions of the Order, or (3) fully comply with other relevant requirements.

This Order is not a finding, adjudication of, or evidence of a violation of any State law by the City nor does the City by its consent agree to any violations of State laws nor admit any liability to any third party or parties. This Order does not relieve the City of any obligation or requirements of the Permits.

This Order is final and effective immediately, and shall not be appealable, and the City waives any hearing on its term and conditions.

It is so ORDERED, CONSENTED,	and AGREED TO this day of _	
2013.	, ^	
FOR THE DIVISION:	Judson H. Turner Director	
FOR THE CITY:	BY (print name):	
	SIGNATURE:	
	TITLE:	
•	DATE:	

City of Valdosta

#### **ATTACHMENT 1**

Permit Effluent Limitation Violations
Withalcoochee WPCP (GA0033235) and Mud Creek WPCP (GA0020222)
January 2008 to March 2013

#### City of Valdosta Permit Effluent Limitation Violations January 2008 to March 2013

#### Withlacoochee WPCP GA0033235

Parameter Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	<u>Date</u> Po	ermit Limit 1706	Reported Value 1970
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-08	30	44.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-08	45	141
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-08	1365	2458
Total Suspended Solids Weekly Maximum Loading, kg/Day	Feb-08	1706	7814
Total Suspended Solids Percent Removal	Feb-08	85%	80.8%
,			
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-08	1706	2315
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-08	400	, 1041
			,
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Aug-08	379	623
Total Suspended Solids Weekly Maximum Loading, kg/Day	Aug-08	1137	1311
Dissolved Oxygen Minimum, mg/L	Apr-09	5.0	3.0
Total Suspended Solids Weekly Maximum Concentration, mg/L	Apr-09	45	59.6
Total Suspended Solids Weekly Maximum Loading, kg/Day	Apr-09	1706	3355
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Apr-09	400	58281
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Ammonia Weekly Maximum Concentration, mg/L	May-09	6.4	7
	•		
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Jan-10	853	970
Total Suspended Solids Weekly Maximum Concentration, mg/L	Jan-10	45	62
Total Suspended Solids Weekly Maximum Loading, kg/Day	Jan-10	1706	3396
Ammonia Weekly Maximum Concentration, mg/L	May-10	6.4	15.7
Ammonia Weekly Maximum Loading, kg/Day	May-10	204	366
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Ammonia Monthly Average Concentration, mg/L	Aug-11	2.0	2.9
Ammonia Weekly Maximum Concentration, mg/L	Aug-11	3.0	4
Ammonia Weekly Maximum Loading, kg/Day	Aug-11	76.0	80.1
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Ammonia Weekly Maximum Concentration, mg/L	Sep-11	3.0	3.6
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Ammonia Weekly Maximum Concentration, mg/L	Jul-12	3.0	3.1
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Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Sep-12	4.0	4.4
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Sep-12	6.0	8.3
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Sep-12	152	180.3
Ammonia Weekly Maximum Concentration, mg/L	Sep-12	3.0	3.5
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Sep-12	400	457.1
s of the state of	00p .E	,00	107.1
Biochemical Oxygen Demand Monthly Average Concentration, mg/L	Oct-12	4.0	4.5
Biochemical Oxygen Demand Weekly Maximum Concentration, mg/L	Oct-12	6.0	8.7
Ammonia Weekly Maximum Concentration, mg/L	Oct-12	3.0	5.8
Ammonia Weekly Maximum Concentration, mg/L Ammonia Weekly Maximum Loading, kg/Day	Oct-12	76	86.6
Anniona Produit Maximum Edading, Ng/Day	001-12	, 0	55.0

#### City of Valdosta Permit Effluent Limitation Violations January 2008 to March 2013

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ivviimacoocnee	VVPUP	GA0033235, cont.	

<u>Parameter</u>	<u>Date</u> Pe	ermit Limit	Reported Value
pH Minimum, S.U.	Jan-13	6.0	4.5
Total Out to 1 1 Out to 11 1 A and 10 out to 11 1 A	F-1-40	00	67.0
Total Suspended Solids Monthly Average Concentration, mg/L	Feb-13	30	67.2
Total Suspended Solids Weekly Maximum Concentration, mg/L	Feb-13	45	98.3
Total Suspended Solids Monthly Average Loading, kg/Day	Feb-13	1365	2476.0
Biochemical Oxygen Demand Weekly Maximum Loading, kg/Day	Mar-13	1706	3542.6
Total Suspended Solids Weekly Maximum Concentration, mg/L	Mar-13	45	149.4
Total Suspended Solids Weekly Maximum Loading, kg/Day	Mar-13	1706	14624
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Mar-13	400	35283

#### Mud Creek WPCP GA0020222

Parameter Total Suspended Solids Weekly Maximum Loading, kg/Day	<u>Date</u> <u>Perr</u>	nit Limit Rep	orted Value
	Aug-08	458	654
Fecal Coliform Weekly Maximum Geometric Mean, CFU/100 mL	Oct-10	400	1158
Ammonia Monthly Average Concentration, mg/L Ammonia Weekly Maximum Concentration, mg/L Ammonia Monthly Average Loading, kg/Day Ammonia Weekly Maximum Loading, kg/Day	Nov-10	1.5	3.8
	Nov-10	2.25	12.2
	Nov-10	18	60.6
	Nov-10	23	108.6

City of Valdosta

#### **ATTACHMENT 2**

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUÂNTITY	REPORTED CAUSE
Service of the Control of the Contro	TRIBUTARY TO JOREE MILL POND	Rose-off Control of Co	Carried Contracts - Section Contracts	HEAVY RAIN, PRESSURE ALSO CAUSED FAILURE TO
2008-02-21	TO TWO MILE BRANCH	817 GORNTO ROAD	6,000	PREVIOUS SEWER REPAIR
	STILLHOUSE BRANCH TRIB TO		Commission and the second seco	
2008-02-21	WITHLACOOCHEE RIVER	3500 COUNTY CLUB ROAD	6,000	HEAVY RAINFALL
	DUKES BAY CANAL TRIBUTARY TO			
2008-02-21	MUD CREEK	108 TUCKER ROAD	18,000	HEAVY RAINFALL
2008-02-21	KNIGHTS CREEK	1001 PONDEROSA DRIVE	- 22,000	HEAVY RAINFALL
2008-02-22	TWO MILE BRANCH	608 HOWELL BROOK DRIVE	35,000	OVERLOAD DURING HEAVY RAIN
2008-08-23	KNIGHTS CREEK	1001 PONDEROSA DRIVE	24,000	INFLOW
2008-11-30	WITHLACOOCHEE RIVER	HIGHWAY 133 @ I-75 EXIT 18	135,000	HEAVY RAINFALL
2009-02-19	TRIBUTARY TO CHERRY CREEK	LAKE LAURIE DRIVE	500	SANITARY OVERFLOW/ ELECTRICAL PUMP FAILURE
2009-04-03	SUGAR CREEK	2408.MEADOWBROOK DRIVE	10,001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2310 PARK LANE	10,001	EXCESSIVE RAIN
2009-04-03	ONE MILE BRANCH	1212 WAINWRIGHT DRIVE @ OLD SUGAR CREEK WWTP	10,001	EXCESSIVE RAIN
2009-08-13	SUGAR CREEK	1314 BAYTREE ROAD	- 18,900	MANHOLE FALLEN INTO STREAM
2009-08-18	UNNAMED TRIBUTARY	KINDERLOU LIFT STATION	5,500	ELECTRICAL- DUE TO SCADA FAILURE
2009-08-26	DUKES BAY CANAL	210 DAMPIER STREET	3,000	GREASE BLOCKAGE
2009-11-11	SUGAR GREEK	1825 NORMAN DRIVE	14,000	BLOCKAGE OF GREASE AND RAGS
2009-11-18	ONE MILE BRANCH	1409 NORTH ASHLEY STREET	7,500	STORM WATER PIPE BROKE SEWER LINE

BEGIN DATE	WATERWAYIMPAGTED	OVERELOW LOCATION	QUANTITY	REPORTED CAUSE
2009-12-02	TWO MILE BRANCH	2408 NORTH PATTERSON	9,000	GREASE BLOCKAGE
2009-12-02	SUGAR CREEK	1825 NORMAN DRIVE	6,000	BLOCKAGE IN SEWER MAIN
2009-12-03	SUGAR CREEK	1815 NORMAN DRIVE	9,999	BLOCKAGE AND EXCESSIVE RAIN
2009-12-08	MUD CREEK	MUD CREEK WWTP	550,000	COLLAPSED MANHOLE
2009-12-09	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/EXCESSIVE RAIN/CLOGGED PUMPS
2009-12-10	MUD CREEK	MUD CREEK WWTP	1,150,000	COLLAPSED MANHOLE/HEAVY RAINS/CLOGGED PUMPS
2009-12-11	MUD CREEK	MUD CREEK WWTP	1,350,000	DAMAGED MANHOLES
2009-12-12	MUD CREEK	MUD CREEK WWTP	950,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-13	MUD CREEK	MUD CREEK WWTP	350,000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-22	SUGAR CREEK	1825 NORMAN DRIVE	14,000	GREASE AND RAGS
2010-01-21	TRIBUTARY TO KNIGHTS CREEK	1001 PONDEROSA DRIVE	12,100	INFLOW AND INFILTRATION (I&I), HEAVY RAIN
2010-01-21	DUKES BAY	700 ROGERS STREET	600	I&I, HEAVY RAIN
2010-01-21	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	138,000	I&I, HEAVY RAIN
2010-01-21	TRIBUTARY TO AN UNNAMED STREAM	700 CYPRESS STREET	64,000	I&I, HEAVY RAIN
2010-01-21	SUGAR CREEK	2408 MEADOWBROOK DRIVE	450,000	I&I, HEAVY RAIN
2010-01-21	DUKES BAY	400 SOUTH OAK STREET	6,000	I&I, HEAVY RAIN

BEGIN DATE	WATERWAYIMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
The second secon	TRIBUTARY TO TWO MILE	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	10   10   10   10   10   10   10   10	Post to the state of an analysis and a substitution of the substit
2010-01-21	BRANCH	817 GORNTO ROAD	20,350	I&I, HEAVY RAINS
2010-01-25	DUKES BAY CANAL	701 CYPRESS STREET	34,000	MANHOLE COLLAPSED
2010-04-04	TWO MILE BRANCH	2408 NORTH PATTERSON STREET	4,000	GREASE BLOCKAGE
2010-04-18	TRIBUTARY TO KNIGHTS CREEK	1201 PONDEROSA DRIVE	500	GREASE BLOCKAGE
2010-04-29	DUKES BAY CANAL	TUCKER ROAD	3,000	LINE BLOCKAGE
2010-06-14	DUKES BAY CANAL	613 SOUTH PATTERSON STREET	- 3,240	BROKEN PIPE
2010-09-27	ONE MILE BRANCH	212 EAST COLLEGE STREET	1,100	1&1
2010-09-29	SUGAR CREEK	1423 GORNTO ROAD	75,000	1&1 DUE TO EXCESSIVE RAIN
2010-09-29	TRIBUTARY TO KNIGHTS CREEK	1003 PONDEROSA DRIVE	27,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	48,000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	ONE MILE BRANCH	212 EAST COLLEGE STREET	6,000	I&I DUE TO EXCESSIVE RAIN
2011-01-18	TRIBUTARY TO CHERRY CREEK	4036 BEMISS ROAD	27,000	GREASE BLOCKAGE
2011-02-07	THREE MILE BRANCH	825 NORTHWOOD PARK DRIVE	187,660	COLLAPSED SEWER
2011-10-12	TWO MILE BRANCH	2501 NORTH PATTERSON STREET @ PENDLETON DRIVE	500	GREASE BLOCKAGE
2011-10-13	TRIBUTARY TO LAKE SHERI	1307 NORTH SAINT AUGUSTINE ROAD	4,600	RAG BLOCKAGE

BEGIN DATE	.WATERWAY!IMPACTED	OVERFLOW-LOCATION -	QUANTITY	REPORTED CAUSE
2011-11-29	SPRINGHOUSE CREEK	3350 PLANTATION DRIVE	9,000	BYPASS PUMP HOSE CONNECTION FAILURE
2012-03-03	CHERRY CREEK	4119 BEMISS ROAD BEMISS ROAD PUMP STATION	24,000	PUMP STATION OVERLOADED BY HEAVY RAINS
2012-03-03	SUGAR CREEK	2412 MEADOWBROOK DRIVE	12,000	HYDRAULIC OVERLOAD
2012-03-08	TRIBUTARY TO KNIGHTS CREEK	301 SOUTH BLANCHARD STREET	189,000	COLLAPSED SEWER MAIN
2012-06-05	TWO MILE BRANCH	NORTH ASHLEY STREET	1,800	SEWER BROKEN BY CONTRACTOR
2012-06-26	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,000	EXCESSIVE RAIN FROM TROPICAL STORM DEBBY
2012-07-11	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,000	EXCESSIVE RAIN
2012-08-07	CHERRY CREEK	4119 BEMISS ROAD	1,000	LEAKING PUMP
2012-08-16	WITHLACOOCHEE RIVER	EXIT 18 @ HIGHWAY 133	2,500,000	PUMP STATION FAILURE
2012-08-16	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2,500,000	BOTH PUMPS AT PUMP STATION FAILED
2013-02-21	KNIGHTS CREEK	3891 INNER PERIMETER ROAD	20,000	GREASE BLOCKAGE
2013-02-25	CHERRY CREEK	4119 BEMISS ROAD	173,000	HYDRAULIC OVERLOAD
2013-02-25	SUGAR CREEK	626 SCOTT DRIVE	720,000	EXCESSIVE RAIN
2013-02-25	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1,290,000	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	ROUSE ROAD	590,500	EXCESSIVE RAIN
2013-02-25	TWO MILE BRANCH	2420 MEADOWBROOK DRIVE	936,000	EXCESSIVE RAIN

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2013-02-25	TWO MILE BRANCH	817 GORNTO ROAD	53,750	EXCESSIVE RAIN
2013-02-25	ONE MILE BRANCH	1248 NORTH LEE STREET	19,200	EXCESSIVE RAIN
2013-02-25	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST	124,500	EXCESSIVE RAIN
2013-02-26	ONE MILE BRANCH	JOREE STREET	29,000	EXCESSIVE RAIN
2013-02-28	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,750,000	1&1, FLOODING FROM RAIN
2013-03-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	I&I, EXCESSIVE RAIN
2013-03-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,000,000	EXCESSIVE RAIN
2013-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	3,400,000	EXCESSIVE RAIN
2013-03-04	DUKES BAY CANAL	1810 SOUTH PATTERSON STREET	100,000	RUPTURED SEWER MAIN
2013-03-24	WITHLACOOCHEE RIVER	HIGHWAY 133 WEST OF WITHLACOOCHEE RIVER BRIDGE	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1423 GORNTO ROAD	20,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	2412 MEADOWBROOK DRIVE	360,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	626 SCOTT DRIVE	300,000	EXCESSIVE RAIN
2013-03-24	SUGAR CREEK	1404 GORNTO ROAD	20,000	EXCESSIVE RAIN

City of Valdosta

#### **ATTACHMENT 3**

EPD Fish Kill Investigations
November 20, 2009 and February 22, 2013



MARK WILLIAMS COMMISSIONER DAN FORSTER DIRECTOR

March 11, 2013

EPDIMPENINP

HAR I I MIN

REGEIVED

**MEMORANDUM** 

TO:

Jane Hendricks

EPD - Wastewater Regulatory Program

Marzich Shahbazaz

EPD - Permitting, Compliance, and Enforcement

FROM:

**Matt Thomas** 

**Assistant Chief of Fisheries** 

SUBJECT:

Fish Kill - Knights Creek

Lowndes County, Georgia

February 22, 2013

Attached is copy of subject fish kill investigation report for your files. Please call me if you have questions.

mt

cc: John Biagi

Bert Deener

Attachment

#### Fish Kill Investigation in Knights Creek In Lowndes County, Georgia February 22, 2013

by Bryant Bowen

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region IV
Waycross, Georgia

Chad Sexton received notification of a fish kill in Knights Creek, Lowndes County on February 22, 2013 around 0945 hours from John Waite (229.292.0842) of Valdosta Water and Sewerage Department resulting from a sewage spill. The spill reportedly started around 2130 hours on February 20, 2013. The city located the spill at 1030 hours February 21, 2013 near the Chadwyck subdivision and repaired the overflowing manhole around 1430 hours. Mr. Waite reported an estimated 20,000 gallons of sewage spilled. Mr. Waite also reported that the department flushed the canal, with treated water, overnight using a nearby fire hydrant. Valdosta Water and Sewerage Department personnel picked up and iced around 30 dead fish on February 21, 2013. After receiving all pertinent information from Mr. Waite and gathering necessary equipment and additional staff, Jason Mitchell and Chad left Waycross to investigate.

Chad and Jason arrived at 1230 hours at the intersection of Inner Perimeter Road and Tyndall Dr. near the origin of the spill (Fig. 1). At this point, it started raining and continued to rain throughout the investigation. Mr. Waite met Chad and Jason around 1315 hours at Site #1 (Fig. 1) and reported that EPD had already been contacted. He relayed the spill history and actions taken by his department and handed over the previously collected dead fish. Based on Mr. Waite's information, there was nowhere to take water quality above or near the spill origin, which was a clogged manhole that overflowed municipal sewage into a ditch with little water in it. Here they encountered the remnants of the spill: the smell of raw sewage and visual debris. They measured basic water quality at all of the rest of the sites using a YSI model 85 oxygen/conductivity meter, a Hach portable water test kit model FF-1, and a YSI model 60 pH meter. They noted that the total hardness and specific conductance readings were elevated at the first site and dropped as they moved downstream. At the time of the investigation, none of the water quality readings were at levels typically capable of killing fish. Water temperatures dropped as they moved downstream, likely because of the heavy rainfall.

Jason and Chad counted and/or collected every visible dead fish between the spill origin and Site #2 (Jaycee Shack Road) but were unable to collect dead fish between Sites #2 and #3 due to lack of access, deeper water, and an impenetrable understory. Therefore, the number of dead fish was estimated using an expansion factor. The expansion factor was determined by dividing the total number of segments by the number of segments in which fish were collected. In this case, we had 5 total segments and were able to collect fish from 2 of those. This provided us with an expansion factor of 2.5.

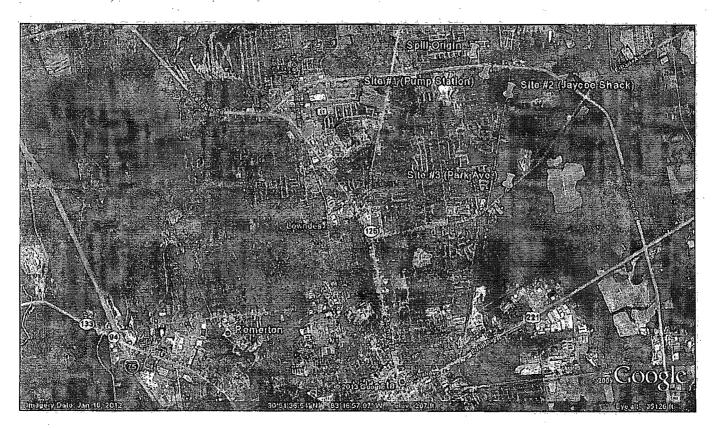
They observed no live fish at any of the 3 sites, mainly because of the reduced visibility caused by the heavy rainfall. The water quality at the last site had improved and no dead aquatic organisms were detected within 200 ft. upstream of Park Avenue. Therefore we determined this was the terminus of the 1.58 mile long fish kill. It was at this point that the field investigation ended. Due to heavy rainfall, Chad and Jason returned to the Waycross Regional Fisheries Management Office to work up all collected dead fishes with Bert Deener.

The initial cause of the fish kill appears to be an oxygen depletion caused by overloading of nutrients from raw sewage into Knights Creek. The system was also flushed with treated city drinking water from a fire hydrant. The total estimated number of fish killed was 469, and the value of these fish was \$219.59 (Table 2). Additionally, 17 crayfish and 16 bullfrog tadpoles were killed. The cost of the investigation was \$845.36 (Table 3). The total cost of the dead fish and the investigation was \$1064.95.

# REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of wate	r: Latitude-Lo	ngitude)				MAJOR	R RIVER BASIN
Knights Creek		•				Alap	aha / Suwanee
NEAREST TOWN				COUNT	Υ .	DATE	OF KILL
Valdosta				Lowr	ndes	2/20	<b>– 2/21/2013</b>
TYPE OF WATER BODY				DURAT	ION OF KILL (If know	/n)	
☐ RIVER OR STREAM	LAKE/POND		ESTUARY	DAYS/F	ours ~ 18 h	ırs.	
F	OLLUT	ION S	OURCE - TY	PE O	F OPERATION	NC	
AGRICULTURAL OPERATION	ONS		INDUSTRI	AL OPER	RATIONS		MUNICIPAL OPERATIONS
☐POISONS (pesticides) ☐FERTILIZERS ☐ MANURE DRAINAGE, ENSILA LIQUORS, OR FEED LOT OPE ☐ HANDLING OF EQUIPMENT A CONDITIONS ☐ OTHER	RATIONS	PROMET	OD & KINDRED ODUCTS TALS BBER & PLASTICS EMICALS TROLEUM		EXTILES EATHER & LEATHER RODUCTS APER & ALLIED RODUCTS JMBER & WOOD PRODUCTS AND & GRAVEL		SEWERAGE SYSTEMS     □ REFUSE DISPOSAL     □ WATER SYSTEM     □ SWIMMING POOL     □ POWER SYSTEM     □ PEST CONTROL     □ OTHER
TRANSPORTATION OPERAT	IONS			OTHER			
☐ RAIL ☐ TRUCK ☐ BARGE			NGEMENT/ENTRAINI	MENT/DA	M DESIGN ☐ OTHER		☐ UNKNOWN
SPECIFIC POLL	UTANT	OR F	ACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC
□ NUTRIENTS     □ RADIONUCLEIDES     □ TEMPERATURE     □ CYANIDES AND PHENOLS	SEDIME	LEUM (OIL NTATION	L & GREASE) /SILTING MICALS (METALS)	☐ PE: ☐ MIX ☑ OTI	(GEN DEFICIENCY STICIDES, HERBICID KED CHEMICALS HER (specify): Possi vith city water and/or	ble chlo	UNKNOWN UNKNOWN
EXTENT OF AREA AF	FECTED		ESTIMATED OR A	CTUAL	SPECIES	OF FISH	KILLED (if known)
MILES OF STREAM 1.58 mi	ACRES OF	LAKE	469				Varmouth, Spotted h bass, Redfin
SEVERITY	OD 🗆	LIGHT	VALUE OF FISH K	ILLED	pickerel, Chai sunfish, Gold Bluegill sunfi Gambusia, Li	n pick fish, U sh, Blu ned to	rerel, Redbreast Inidentified sunfish, Juespotted sunfish, pminnow, Swamp raide, Flat bullhead
ADDITIONAL REMARKS (Include e					p.)		
The spill killed other ac						ayfish	, 16 Tadpoles,
Chad Sexton Jason Mitchell	P.O. Bo Waycro (912)28	x 2089 ss, GA	31502	PHONE N	IUMBER		2/26/2013
EPD FOLLOW-UP INVESTIGATION	REFERRED	ro:	ACTIONS TAKEN (IF	known) (E	EPD)		WQMU (EPD)
						,	

Figure 1. Map of study area for the fish kill investigation on Knights Creek in Valdosta, Lowndes County, GA on February 20-22, 2013.



	Legend	
Spill Origin	30°52'58.91"N	83°15'29.50"W
Site # 1 (Pump Station)	30°52'46.42"N	83°15'22.86"W
Site #2 (Jaycee Shack)	30°52'33.77"N	83°15'8.27"W
Site #3 (Park Avenue)	30°51'40.78"N	83°15'16.42"W

Figure 2. Photo of manhole that was the spill origin (photo taken on February 22, 2013).



Figure 3. First road culvert holding water near spill origin (taken on February 22, 2013).

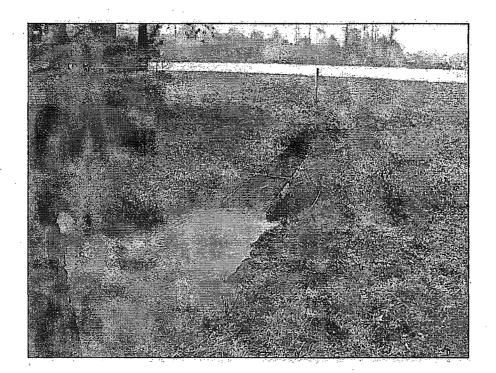


Table I. Water quality measurements made during the fish kill investigation on Knights Creek in Lowndes County February 22, 2013 including GPS coordinates.

Station name or location	Time (hrs)	Water depth (ft)	Water Temp (°C)	D.O. (ppm)	pН	Total hardness (ppm)	Total alkalinity (ppm)	Specific conductance (µs)	Dead fish	GPS coordinates
Site # 1 (Pump Station)	1350	Surface	18.5	5.6	6.2	154	68	306	Yes	30°52'46.42"N 83°15'22.86"W
Site #2 (Jaycee Shack) Road	1430	Surface	16.4	6.1	6.1	68	34	252 .	Yes	30°52'33.77"N 83°15'8.27"W
Site #3 (Park Avenue)	1536	Surface	15.4	7.01	6.1	68	68	91	No	30°51'40.78"N 83°15'16.42"W

Table 2. Number and monetary value of dead fish from the fish kill investigation in Knights Creek, Lowndes County, on February 20 - 22, 2013.

Species	Number of dead fish b	Value (\$) <sup>a/b</sup>		
Lake chubsucker	26	21.85		
Erimyzon sucetta	20	21.03		
Flat bullhead	33	25.00		
Ameiurus platycephalus	,	23.00		
Western mosquitofish	8	1.04		
Gambusia affinis	G	,		
Redbreast sunfish	225	75.75		
Lepomis auritus	1111	. 75.75		
Warmouth	40	16.23		
Lepomis gulosus	. 40			
Bluegill	10	3.15		
Lepomis macrochirus	, •••	2.15		
Spotted sunfish	68	21.36		
Lepomis punctatus	·	21.50		
Largemouth bass	15	24.58		
Micropterus salmoides		21.50		
Redfin pickerel	10	15.97		
Esox americanus	•			
Chain pickerel	3	4,29		
Esox niger		,		
Goldfish	5	2.05		
Carrassius auratus auratus	-			
Bluespotted sunfish	2	Λ Ω1		
Enneacanthus gloriosus	3	0.81		
Lined topminnow	-	0.54		
Fundulus lineolatus	5	0.54		
Swamp darter	10	4.00		
Etheostoma fusiforme	10	4.22		
Brook silverside	2	0.75		
Labidesthes sicculus	3	0.75		
Unidentified sunfish		2.00		
	8	2.00		
Total	469	\$219.59		

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

b Expanded value = number counted multiplied by an expansion factor.

The expansion factor = total number of segments/number of segments sampled = 5/2 = 2.5

Table 3. Costs for the fish kill investigation on the Knights Creek in Lowndes County from February 20-22, 2013.

Item	Amount	Cost (\$)	
Personnel a			
Fisheries Biologist I	8 hours	\$233.53	
Fisheries Technician III	12 hours	\$314.04	
Fisheries Technician II	8.5 hours	\$194.57	
Regional Supervisor	1 hour	\$38.22	
Vehicles			
129823	130 miles	\$65.00	
Total		\$845.36	

<sup>&</sup>lt;sup>a</sup> Values include fringe benefits.

Fish Kill Investigation: One Mile Branch In Lowndes County, Georgia On November 20, 2009

> By Jeremy Wixson

Georgia Department of Natural Resources
Fisheries Management Section
Southcentral Region
Fitzgerald, Georgia

November 24, 2009

On Thursday November 19, 2009 at 3:45 p.m., Bill Noelle (404-362-2624) of Georgia EPD telephoned the Bowen's Mill Office to notify us of a fish kill in the city of Valdosta in Lowndes County Georgia. Marty Snowden took the call and linked me in the field to let me know. I was planning to sample fish that night and was not able to get to Valdosta before dark. I telephoned Bill Noelle and left a message for him on Friday November 20, 2009. I then telephoned John Waite (229-292-0842 cell, jwaite@valdostacity.com), Environmental Manager with the City of Valdosta. John informed me that there had been a break in a wastewater line that occurred in the Coca-Cola Bottling Plant parking lot. The leak was first discovered by a work detail cleaning One Mile Branch. The City dispatched utility crews to determine the cause and make repairs to the line. It was an 8-inch vitrified clay pipe and the water in it was coming from businesses in the area including a large laundromat. They discovered the broken pipe on Wednesday November 18, 2009. To fix the pipe, they dammed up One Mile Branch just below the site the wastewater was entering the branch, and used a gasoline pump to pump the water back into the sewage system. They estimated that approximately 7,500 gallons was discharged to the Branch before they got the pump in place. On Thursday November 19, 2009, Utility Department staff was checking the Branch downstream of the break and noticed some dead fish in One Mile Branch. They called EPD, who in turn called us. Bill Noelle indicated that EPD staff would be investigating on November 20, 2009 as well.

Edward Zmarzly and Jeremy Wixson went to the location of the fish kill on November 20<sup>th</sup> and took water quality measurements at the North Lee Street crossing (Figure 1, WQ station 1) at 1230 hours, at the break site (Figure 1, WQ station 2) at 1244 hours, and at the Williams Street Crossing (Figure 1, WQ station 3) at 1348 hours. Water was flowing slowly in the branch, and in all locations live fish were observed. We then went to the site of the broken sewer line and began counting the fish observed according to species and size, working our way downstream until we no longer observed dead fish. The kill area was spread out from the location of the broken sewer line (Figure 1, purple marker by WQ station 2) to 0.69 miles downstream on the Valdosta State University Campus (Figure 1, purple marker between WQ stations 3 and 4). When we finished taking inventory of the dead fish, we went downstream to take a final set of water quality readings at the West Gordon Street Crossing (Figure 1, WQ station 4) at 1610 hours. We were unable to determine if the fish kill was a direct result of the broken pipe's effluent or from installation of a temporary dam used to catch the effluent.

We measured basic water quality with a YSI model 550 oxygen meter and a Hach portable water test kit model FF-1 (Table 1). Dissolved oxygen was lowest at the WQ station 1, which was a little shallower and slower moving than the other stations. The pH was highest at the location of the sewage line break (WQ station 2), but had become more neutral by the time it reached WQ station 3.

In total we found 510 dead fish with a total value of \$186.45 (Table 2), there was one crayfish also dead in the area. The cost of investigating the fish kill (Table 3) was \$1,215.99. The total value of the fish kill including the cost of investigation and the value of the fish killed was \$1,402.44.

Figure 1. Map of One Mile Branch area of fish kill investigation.

Table 1. Water quality measurements made during the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

November 20, 2009.					``			
Station Number and Location	Time (hrs)	Depth (ft)	Temperature (°C)	DO (ppm)	pН	Hardness (ppm)	Alkalinity (ppm)	Dead Fish
1. N Lee Street 30.84862° N 83.27824° W	1230	Surface	16.1	3.3	7	48	12	NO
2. Marion Street 30.84755° N 83.27940° W	1244	Surface	21.7	5.5	9	60	24	YES
3. Williams Street 30.84748° N 83.28365° W	1348	Surface	16.3	4.2	6.5	44	24	YES
4. W Gordon Street 30.84041° N 83.30654° W	1610	Surface	17.5	8.15	6.5	36	24	NO

Table 2. Number and monetary value of dead fish from the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Species	Number of Dead Fish	Value (in dollars) <sup>a</sup>
American Eel	1	2.37
Anguilla rostrata		
Golden Shiner	35	7.75
Notemigonus crysoleucas		o
Bullhead Catfish	62	68.56
Ameiurus spp.		
Mosquitofish	196	25.48
Gambusia spp.	·	
Bluegill	156	54.55
Lepomis macrochirus		,
Redbreast Sunfish	. 59	27.44
Lepomis auritus		
Spotted Sunfish	1	0.30
Lepomis punctatus		
Total	510	186.45

<sup>&</sup>lt;sup>a</sup> Southwick, R. I., and A. J. Loftus, editors. 2003. Investigation and monetary values of fish and freshwater mussel kills. American Fisheries Society, Special Publication 30, Bethesda, Maryland.

Table 3. Costs for the fish kill investigation on One Mile Branch in Lowndes County on November 20, 2009.

Item	Amount	Cost (\$)	
Personnel a			
PS: Nat Res Biologists (WL)	20 hours	584.00	
TS: Natural Resources Tech (AL)	21 hours	506.94	
Vehicles			
129772	191 miles	105.05	
Other			
Supplies	1 set	20.00	
Total		\$1215.99	

<sup>&</sup>lt;sup>a</sup>Cost includes fringe benefits

# REPORT OF POLLUTION-CAUSED FISH KILL

LOCATION (Name of body of water: Latitude-Longitude)  MAJC						MAJOR RIVER BASIN	
One Mile Branch (Tributat	ry to Withlacooche	° N, 83	3.27940° W	Suwa	annee		
NEAREST TOWN				NTY DATE (		OF KILL	
Valdosta	•		Lowr	ndes	des November		
TYPE OF WATER BODY	,		DURATION OF KILL (If known)				
☑ RIVER OR STREAM ☐ 1	LAKE/POND	ESTUARY	DAYS/H	lours Severa	l hour	rs	
Р	OLLUTION	SOURCE - TY	PE Õ	F OPERATION	ŊС		
AGRICULTURAL OPERATION	ONS	INDUSTR	IAL OPER	RATIONS		MUNICIPAL OPERATIONS	
□ POISONS (pesticides) □ FERTILIZERS □ MANURE DRAINAGE, ENSILAGE □ LIQUORS, OR FEED LOT OPERATIONS □ HANDLING OF EQUIPMENT AND □ CONDITIONS □ OTHER □ MINING □ FOOD & KINDR □ METALS □ METALS □ METALS □ CHEMICALS □ CHEMICALS □ PETROLEUM □ OTHERS:			☐ TEXTILES ☐ LEATHER & LEATHER PRODUCTS ☐ PAPER & ALLIED PRODUCTS ☐ LUMBER & WOOD PRODUCTS ☐ SAND & GRAVEL			SEWERAGE SYSTEMS  □ REFUSE DISPOSAL  □ WATER SYSTEM  □ SWIMMING POOL  □ POWER SYSTEM  □ PEST CONTROL  □ OTHER	
TRANSPORTATION OPERAT	OR BOAT   IM	PINGEMENT/ENTRAINI DNSTRUCTION	OTHER	M DESIGN ☐ OTHER		□ UNKNOWN	
SPECIFIC POLL	UTANT OR F	ACTOR CHA	NGIN	G WATER C	HAR	ACTERISTIC	
☐ NUTRIENTS ☐ RADIONUCLEIDES ☐ TEMPERATURE ☐ CYANIDES AND PHENOLS	☐ ORGANIC CHE! ☐ PETROLEUM (C ☐ SEDIMËNTATIO ☐ INORGANIC CH	IL & GREASE)	☐ PE:	YGEN DEFICIENCY STICIDES, HERBICID KED CHEMICALS 'HER (specify):	ES, ETC	☐ pH ☐ TURBIDITY ☑ UNKNOWN	
EXTENT OF AREA AF	FECTED	ESTIMATED OR A	CTUAL			KILLED (If known)	
MILES OF STREAM 0.69	510 – direct Bullhead spp., M			p., Mo	l, Golden Shiner, ., Mosquitofish, Bluegill, Infish, Spotted Sunfish		
SEVERITY	`	VALUE OF FISH K	ILLED				
☐ TOTAL ☐ HEAVY ☐ M	OD ⊠LIGHT	\$186.45					
ADDITIONAL REMARKS (Include effects on other than fish, e.g., shellfish, waterfowl, etc.) Saw one dead Crayfish.							
INVESTIGATOR MAILING ADDRESS AND PHONE NUMBER					DATE OF REPORT		
Jeremy Wixson 1773A Bowens Mill Highwa Fitzgerald, GA 31750 229-426-5272						November 24, 2009	
EPD FOLLOW-UP INVESTIGATION REFERRED TO: ACTIONS TAKEN (If known) (EPD) WQ					WQMU (EPD)		

City of Valdosta

#### **ATTACHMENT 4**

City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1)
January 1, 2008 to April 30, 2013

# City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to April 2013

BEGIN DATE	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2008-01-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,473,000	HYDRAULIC OVERLOAD, CAUSED BY RAIN
And the second s				HEAVY RAIN, INFLOW AND INFILTARION (I/I) DURING WEEK
2008-02-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7,700,000	OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2000 02 22	MUTHER COOCUET DIVER	2252 WETUSSINGTON LANS	45 500 000	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,500,000	5" on 2/21 and 2" on 2/22 HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15 200 000	5" on 2/21 and 2" on 2/22
2000 02 25		3332 WETTERMOTON LANE	13,200,000	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN,
2008-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16,400,000	5" on 2/21 and 2" on 2/22
				HEAVY RAIN CAUSED HIGH PEAK FLOW LEADING TO
2008-04-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,600,000	HYDRAULIC OVERLOAD OF SECONDARY CLARIFIERS
2008-08-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,200,000	HYDRAULIC OVERLOAD
2008-08-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16,900,000	HYDRAULIC OVERLOAD
2008-08-26	MUD CREEK	1638 NEW STATENVILLE ROAD	6,300,000	HYDRAULIC OVERLOAD FROM TROPICAL STORM FAY
2008-11-29	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,500,000	I&I, HEAVY RAINFALL
2009-01-27	MUD CREEK	1638 NEW STATENVILLE ROAD	2,700,000	CLOGGED ACTIVATED SLUDGE TUBES
2009-03-31	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,800,000	HIGH SOLIDS IN EFFLUENT FLOW AND EXCESSIVE RAIN
2009-04-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	18,300,000	EXCESSIVE RAIN
2009-04-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	24,800,000	FLOODING
2010-01-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,400,000	I&I, HEAVY RAIN
2010-01-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	14,900,000	INFLOW FROM HEAVY RAIN

#### City of Valdosta Major Spills as Defined by 391-3-6-.05(2)(b)(1) January 2008 to April 2013

BEGIN DATE:	WATERWAY IMPACTED	OVERFLOW LOCATION	QUANTITY	REPORTED CAUSE
2010-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,000,000	INFLOW FROM HEAVY RAIN
2010-03-11	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12,200,000	INFLOW FROM HEAVY RAIN
2010-04-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	5,900,000	BIOLOGICAL UPSET OF SECONDARY TREATMENT SYSTEM
2011-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,100,000	RAIN INDUCED, HYDRAULIC PROBLEM AT PLANT
2011-02-10	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10,300,000	HYDRAULIC OVERLOAD
2011-02-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6,825,000	MECHANICAL FAILURE
2012-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8,380,000	HYDRAULIC OVERLOAD OF WPCP SECONDARY SYSTEM
2013-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9,047,000	HYDRAULIC OVERLOAD
2013-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	11,673,000	HYDRAULIC OVERLOAD
2013-02-26	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15,173,000	EXCESSIVE RAIN

City of Valdosta

### **ATTACHMENT 5**

EPA Comments of the City's Sewer Overflow Response and Reporting Procedures
April 11, 2013

EPA Comments on Sewer Overflow Response and Reporting Procedures: City of Valdosta – Response to 10/23/2012 Section 308 Request (Attachments E and F)

#### Standard Operating Procedure (Attachment E)

- 1. Section II.A.1. If the crew confirms an overflow is occurring, then the start time recorded should be the initial time reported, or earlier if there is credible testimony, and not the time that the overflow was discovered by the crew. This should also be reflected in the process diagram.
- 2. Section II.A.5. Additional instruction concerning the perspective(s) and settings for the photographs is likely needed to ensure photos are taken that are of use in making estimations.
- 3. Section II.A.6. Additional instruction concerning procedure for measurements is likely needed to ensure measurements are obtained accurately.
- 4. Section II.A.9. Identification of the name of the waters is also necessary for reporting purposes.
- 5. Section II.B.2. Additional instruction concerning how to document causal observations is likely needed to ensure the information collected has consistent specificity.
- 6. Section III.D. Washing down the area after application of the disinfectant could still result in pollutants to the storm drain. Quarantining and collecting the wash water, or instructing that no wash water is to be directed or drained to the storm drain may be a prudent addition.
- 7. Section IV. Direction regarding how to respond and communicate back-ups to basements or homes due to the sewer overflow conditions is needed.
- 8. Section IV. Direction regarding how to record and communicate sewer overflows that do not reach waters of the state is needed.
- 9. Process diagram. Start time of overflow should be specified as noted above. More than one picture may be taken.

#### Methods of Estimation

The two page document (Attachment F) offers insufficient instruction for performing the estimations of discharge. Valdosta needs to formalize its techniques and attach instruction to the standard operating procedure.

City of Valdosta

#### **ATTACHMENT 6**

Corrective Action Plans and Schedules April 10, 2013

## **Corrective Action Plans and Schedules**

Action Item No.	Action Description	Completion Date		
1a. (Phase 1)	Pump Station, Force Main, Headworks and Equalization Basin Project: Design and construct two new master pump stations and two smaller pump stations along with a new force main to a new headworks structure with grit removal and bar screens at the same location for the new Withlachoochee WPCP. In addition a 6.0 MG equalization basin will be included at this site for initial wet weather flows and future flow equalization through the new treatment plant. The flow from this project will be gravity fed to the existing WPCP for final treatment and discharge utilizing the existing plant outfall. This project will replace an existing 54-inch gravity sewer main to the current plant as well as the existing influent pump station, both of which are highly prone to severe inflow and flooding from the Withlachoochee River.	July 2015		
1b. (Phase 2)	Relocation of Withlacoochee WPCP to new location 60 feet above current flood level: Upon completion, the relocated Withlacoochee WPCP will continue to use the existing Withlacoochee WPCP outfall on the Withlacoochee River.	August 2016		
2.	Collection System Evaluation Program: Continue implementation of and complete a 5-year system wide plan to evaluate the entire sanitary sewer collection system (300 miles of lines with 75 miles completed) and develop schedule for repairs. The evaluation will include the inspection of all manholes and collection system lines using smoke testing first to be followed by Closed Circuit Television (CCTV) Inspections of high priority areas. The evaluation will be utilized to prioritize and perform critical repairs and also to plan and prioritize major rehabilitation projects for the future. A schedule to complete major rehabilitation projects identified during the evaluation will be submitted for EPD approval by December 2018.	December 2018		
3.	Manhole Replacement/Rehabilitation Program: Continue existing program completing inspection of approximately 3,390 remaining manholes (2,610 inspected to date) and prioritizing replacement or rehabilitation of the most deteriorated manholes. Complete the replacement or rehabilitation of a minimum of 60 manholes each year until all priority 1 manholes are completed. A schedule will be submitted to EPD for ongoing rehabilitation to address priority 2 and all remaining manholes on an annual basis.	December 2018		
4a.	Lift Station Rehabilitation/Replacement Program: Continue with existing rehabilitation/replacement program until all existing older lift stations are completed. This will include connection to SCADA and/or auto-dialer systems along with emergency power capabilities for connection to portable generators should power to station be lost.	December 2018		
4b.	Purchase Portable Generators for lift stations: The purchase of three portable generators will be completed (one per year, with the	December 2016		

	first generator purchased by December 2014) so that any existing lift station, not wired with two independent electric feeds, can be quickly connected to a portable generator for emergency power needs. In addition to the generators, the City will work with Godwin Pumps to meet emergency bypass pumping needs at each of our lift stations whenever needed.	
5.	Ongoing Repairs to the Existing Withlacoochee WPCP: Ongoing repairs to the existing Withlacoochee WPCP will be conducted to maintain permit compliance until such time as the new treatment plant is brought online. Present repairs include new bar screens and temporary blower system.	January 2014

## GEORGIA ENVIRONMENTAL PROTECTION DIVISION WASTEWATER REGULATORY PROGRAM 4220 INTERNATIONAL PARKWAY, SUITE 101 ATLANTA, GEORGIA 30354

City of Valdosta

## ATTACHMENT 7

Sanitary Sewer Projects Completed By the City From 2009 to Present April 9, 2013

No.	Completed Sewer Projects from 2009 to Present		Cost
	Project  CMMS for the Heilitz Department	ው	
1 ·	CMMS for the Utility Department	\$	85,00
2 -	Mud Creek Emergency Manhole Repair	\$	103,00
3	Withlacoochee Biosolids Converyor Repair (FEMA)	\$	52,00
4	Withlacoochee Multi-Media Filters Repair (FEMA)	\$	46,00
5	Replacement of SO2 and CL2 systems (FEMA)	\$	82,700.
.6	Replacement of Reuse system controls (FEMA)	\$.	13,377.
7	Eectronics dryout and replacement of pannels, transformers, and misc components (FEMA)	\$	169,277.
8	30% Design för Force Main, EQ Basin and Lift Stations	\$	100,0
9	CCVT Evaluation of Mud Creek and Knights Creek Trunk Lines	\$	122,0
10	Cleaning of Withlacoochee Influent Pump Station Wet Well	\$	373,0
11	Rehabilitation of Four Problematic Lift Stations	\$	1,500,0
12	Withlacoochee Nitrification Pump Replacement	\$	1,300,0
13	Withlacoochee Influent Pump Station Impeller Replacement	ъ \$	90,0
13		A	18年17年18年2月2日至17日
	Withlacoochee RAS Controller Replacement	<b>\$</b>	36,0
15	Thickener pump replacement	\$	53,068.
16	Valve actuators for liftstation	\$	<b>8,</b> 369.
17	3 = 14hp Wilo pumps	\$:	<b>38,</b> 110.
-18	RAS pump impellers	-\$	33,642.
19	4 - 5hp submersible pumps     →	\$	20,154.
20	Phase 1 Manhole Rehabilitation	\$	205,0
21	Country Club Emergency Manhole Repair	\$	72,0
22 -	Withlacoochee Roughing Tower Controller Replacement	\$	38,0
23	Purchase of 75-acres for Relocation of Plant	\$	1,012,5
24	Water and Sewer Rate Analysis	\$	50,0
25	Construction of Tucker Road Lift Station	\$	204,0
26	Withlacoochee Belt Press Major Repairs	\$	52,0
27	Phase 2 Manhole Rehabilitation	\$	237,0
28	Goodyear Lift Station Rehabilitation	\$	104,0
29	CCTV work for Big County Lift Station Service Area	\$	108,0
30	100% Design for Force Main, EQ Basin and Lift Station	\$	1,400,0
31	Withlacoochee Emergency Repairs for broken 20-inch Valve	\$	616,0
32	Withlacoochee Sludge Pump Replacement	\$	54,0
	- A transfer of the control of the first of the control of the c		
33	Blanchard Street Emergency Repairs	<b>\$</b>	234,0
34	Temporary Bar Screens at Withlachoochee	\$	104,7
35	Temporary Blower System at Withlachoochee	\$	376,1
36	Projected Easement costs for force main project	\$	370,0
37	Recent emergency repairs at Withlachooche follow Flood	\$	- 203,2
38	Repair to Tucker Road Outfall	\$	27,4
40	Mud Creek WPCP Expamnsion and Upgrades	\$	41,000,0
	Total:	\$	49,453,78

From:

Phillips, David

Sent:

Thursday, April 11, 2013 3:41 PM

To:

Kim Hembree

Cc:

Marzieh Shahbazaz; Horsey, Maurice

Subject:

Valdosta, GA (EC)

Attachments:

EPA Comments on Sewer Overflow Response and Reporting Procedures.docx

Kim,

Attached are our comments on the Valdosta sewer overflow response plan, as requested. When available for us to offer comment, please forward the draft action to Brad Ammons (Ammons.Brad@epa.gov) and myself.

Thank you,

#### David R. Phillips

Clean Water Enforcement Branch U.S. EPA Region 4 404-562-9773 (Tel) 404-562-9729 (Fax)

- · Environmental Engineer
- · Senior Commissioned Enforcement Officer-
- · Industrial Pretreatment Program Coordinator

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EPA Comments on Sewer Overflow Response and Reporting Procedures: City of Valdosta – Response to 10/23/2012 Section 308 Request (Attachments E and F)

## Standard Operating Procedure (Attachment E)

- 1. Section II.A.1. If the crew confirms an overflow is occurring, then the start time recorded should be the initial time reported, or earlier if there is credible testimony, and not the time that the overflow was discovered by the crew. This should also be reflected in the process diagram.
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- 4. Section II.A.9. Identification of the name of the waters is also necessary for reporting purposes.
- 5. Section II.B.2. Additional instruction concerning how to document causal observations is likely needed to ensure the information collected has consistent specificity.
- 6. Section III.D. Washing down the area after application of the disinfectant could still result in pollutants to the storm drain. Quarantining and collecting the wash water, or instructing that no wash water is to be directed or drained to the storm drain may be a prudent addition.
- 7. Section IV. Direction regarding how to respond and communicate back-ups to basements or homes due to the sewer overflow conditions is needed.
- 8. Section IV. Direction regarding how to record and communicate sewer overflows that do not reach waters of the state is needed.
- 9. Process diagram. Start time of overflow should be specified as noted above. More than one picture may be taken.

### Methods of Estimation

The two page document (Attachment F) offers insufficient instruction for performing the estimations of discharge. Valdosta needs to formalize its techniques and attach instruction to the standard operating procedure.

## Ammons, Brad

Subject:

EPA/GA EPD conf call re: Valdosta next steps (SSO/WWTP)

Location:

15G (EPA)/Call-In # provided for GA EPD

Start: End:

Tue 3/19/2013 10:00 AM Tue 3/19/2013 11:00 AM

Recurrence:

(none)

**Meeting Status:** 

Meeting organizer

Organizer:

Ammons, Brad

Required Attendees:

Jane Hendricks; Marzieh Shahbazaz; Phillips, David; Ammons, Brad; Horsey, Maurice; Diaz,

Categories:

Meeting

Call-In:

(404) 562-9928

Passcode:

629928#

EPA

Brad Anmone David Phillips GA EPD Jane Handicks Marzieh Shehbezez

Maurice Horsey

Kem Hembree

Denisse Diaz

-> GA EPD had Show Guse mtg. last week. Plan to move forward w/ Consent Order. Will include schedule for assessment/rehab of entire system + schedule for moving wwTP (2015 deadline in EPD).

-> Hope to have draft CO to City win 60 days.

David's concerns:

· SORP - review, revise SORP to incl. abatement of SSO's David to send comments re: this (next 2 wks). Then, meet @ 30 days.

-CAP/IRP - assess/rehab entire system (will be in Order).

• PIS - adding SCADA; no beckup power => City plans on-site
generator @ larger PIS's + plan to get portable generators) for smaller Plsi.

	Call w/ GAEPD - Valdosta, GA 3-19-13							
· · · · · · · · · · · · · · · · · · ·	Jane, Kim, Marzieh, Maurice, Forad, David, Denisse Diaz							
	- EPD on track w/Co. Show-cause last week. Similar to past 580 orders.							
	- CTS evaluation of whole system. - EPD. 24r schedule (2015) for building new POTW.							
	- Draft Co within leodays.							
- SORP connents to EPD bafore we must. (week) - Becauseded: Constelle Survey backs a part Stations.								
	- Recommended: complete survey, backers pur amajor stations,							
· ·	- Kim will get w/me when draft is ready. (CO)  - State will send a CD: EPA will assist but not send its own action.							
	- Start will send a CD; EVA will assist but not sent its own action.							
	II · · · · · · · · · · · · · · · · · ·							

From:

Marzieh Shahbazaz < Marzieh. Shahbazaz@dnr.state.ga.us >

Sent:

Thursday, March 07, 2013 9:34 AM

To:

Jane Hendricks; Ammons, Brad

Cc:

Diaz, Denisse; Horsey, Maurice; Phillips, David

Subject:

Proposal for EPA/EPD call re: Valdosta

Thanks Brad, let me look at our schedules and see what date and time work for us and I will get back to you. thanks

>>> "Ammons, Brad" <Ammons.Brad@epa.gov> 3/7/2013 8:44 AM >>> Jane/Marzieh:

We would like to have a call with you all to discuss next steps regarding Valdosta and its SSO/WWTP violations some time the week of March 18-22. Below is our availability:

Mon: Available except for 1-3 pm;

Tues.: Available except for 8:30-9:30 am + 2-3 pm;

Wed.: Available except for 10-11 am;

Thurs.: Available except for 9-11 am + 2-3 pm;

Fri.:

Available any time.

Please propose a time and I will send an e-vite with a call-in # once we finalize the date/time.

Thanks,

**Brad Ammons Environmental Engineer** Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F) http://www.epa.gov/region4/water/wpeb/index.html

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From:

Ammons, Brad

Sent:

Thursday, March 07, 2013 8:45 AM

To:

Jane Hendricks; Marzieh Shahbazaz

Cc: Subject: Phillips, David; Horsey, Maurice; Ammons, Brad; Diaz, Denisse Proposal for EPA/EPD call re: Valdosta

Jane/Marzieh:

We would like to have a call with you all to discuss next steps regarding Valdosta and its SSO/WWTP violations some time the week of March 18-22. Below is our availability:

Mon: Available except for 1-3 pm;

Tues.: Available except for 8:30-9:30 am + 2-3 pm;

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Thurs.: Available except for 9-11 am + 2-3 pm;

Fri.: Available any time.

Please propose a time and I will send an e-vite with a call-in # once we finalize the date/time.

Thanks,

#### **Brad Ammons**

Environmental Engineer Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F)

http://www.epa.gov/region4/water/wpeb/index.html

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From:

Ammons, Brad

Sent:

Monday, March 04, 2013 10:14 AM

To:

Phillips, David Horsey, Maurice

Cc: Subject:

FW: Withlacoochee Wastewater Treatment Plant Fully Operation

FYI.

#### **Brad Ammons**

Environmental Engineer Clean Water Enforcement Branch Municipal & Industrial Enforcement Section U.S. EPA Region 4 61 Forsyth St., SW Atlanta, GA 30303 (404) 562-9769 (O) (404) 562-9729 (F)

(404) 302-9729 (F)

http://www.epa.gov/region4/water/wpeb/index.html

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From: Larry Hanson [mailto:lhanson@valdostacity.com]

Sent: Monday, March 04, 2013 9:05 AM

To: Ammons, Brad

Subject: Withlacoochee Wastewater Treatment Plant Fully Operation

Press release from yesterday afternoon.

#### FOR IMMEDIATE RELEASE

Release #03-13-02

March 3, 2013

## Withlacoochee Wastewater Treatment Plant Fully Operation

At approximately 1:30 p.m. today, March 3, the Withlacoochee Wastewater Treatment Plant was brought online and returned to normal operation, after a loss of function for only three days compared to the nine days of complete loss of function experienced in the flood of 2009. Today, the river receded to the point where the temporary by-pass pumps could be connected to the existing valves. The system was turned on, became fully operational and began full treatment capabilities.

Lessons learned from the 2009 flood resulted in proactive measures which include the following:

The installation of bypass pumps, pipes and valves to utilize in the event of an emergency or act
of God.

- In 2009, the berm only protected the pump station, which did not prevent flooding of the
  chemical building, the chlorine contact building, the filters and the belt presses. The plant's
  electrical system was destroyed in the flooded area and the filters and belt presses were
  inoperable.
- In this event, the electric system, chlorine cylinders, de-chlorination system and all flooded areas were turned off to avoid the damage that was experienced in 2009.
- In this event, the biological, natural occurring bacteria that are used in the treatment process
  were saved so that the system could treat wastewater immediately when it was turned back
  on. In 2009, the natural occurring bacteria were washed out of the plant as a result of the
  continuous pumping during the event.
- In this event, the plant was fully operational in three days. In 2009, the plant had a complete
  loss of function for nine days and was not fully operational for over a month.

The city's drinking water supply is in no way affected by the recent flood event. The Withlacoochee Wastewater Treatment Plant flooded in its current location in the unincorporated area of Lowndes County, which is at the bottom of a 1,500 square mile drainage basin and the source of most of the flood waters received at the plant and throughout the city. The city's Water Treatment Plant is located on Guest Road, over 15 miles northeast of the Withlacoochee Wastewater Plant, and the river flows south from the Wastewater Treatment Plant. There is no known connection between the Withlacoochee River south of the Withlacoochee Wastewater Treatment Plant and the Floridan Aquifer, where the City of Valdosta withdraws its drinking water for its citizens. Furthermore, the city's seven wells, which withdraw the water from the aquifer 300 feet below the surface, are located near the Water Treatment Plant, adjacent to and within Freedom Park.

With the flood waters beginning to recede, the city has initiated cleanup efforts in low-lying and flooded areas, which include disinfection where necessary. Cleanup efforts will continue for several days or until all affected areas have been disinfected and cleaned. Until then, the city continues to encourage the public to avoid any contact with the flood waters for their health and safety. For more information, contact the Public Information Office at (229) 259-3548.

-end-

From:

Diaz. Denisse

Sent:

Monday, March 04, 2013 8:18 AM

To:

Horsey, Maurice; Ammons, Brad; Phillips, David

Subject:

FW: david lambert signing in

----Original Message----

From: Thomas, Chris

Sent: Monday, March 04, 2013 7:22 AM

To: Thomas, Chris; Giattina, James; Mundrick, Doug; Diaz, Denisse

Cc: Hyatt, Marshall; Nuhfer, Mark
Subject: RE: david lambert signing in

Sorry Denisse - I forgot to include you on this message. Here it is.

----Original Message-----

From: Thomas, Chris

Sent: Monday, March 04, 2013 7:19 AM To: Giattina, James; Mundrick, Doug Cc: Hyatt, Marshall; Nuhfer, Mark Subject: FW: david lambert signing in

FYI - Another GA/FL Interstate permitting issue. . . .

----Original Message----

From: Bartlett, Drew [mailto:Drew.Bartlett@dep.state.fl.us]

Sent: Friday, March 01, 2013 5:48 PM

To: Grandin, Susan C.; David Lambert; Thomasson, Mark; Klena, Chris M.; Nuhfer, Mark; Thomas,

Chris

Cc: Vielhauer, Trina

Subject: RE: david lambert signing in

We can engage. This is a permitting and cross boundary issue so we will also need to engage EPA Region 4 and the permitting Division (all copied).

----Original Message----

From: Grandin, Susan C.

Sent: Friday, March 01, 2013 5:40 PM

To: David Lambert Cc: Bartlett, Drew

Subject: RE: david lambert signing in

David,

This doesn't really fall under my purview, but I'm copying someone in whose wheelhouse it does fall. Drew Bartlett and his team have worked for years to improve our water quality in Florida, and they have recently created the Numeric Nutrient Criteria for the state. Its really the leader system in the nation.

Drew, any ideas?

Susan C. Grandin Director, Division of State Lands Department of Environmental Protection 3900 Commonwealth Blvd. MS #100

Tallahassee, FL 32399-3000

Office: (850)245-2555 Mobile: (850)519-0208

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. Copy the url below to a web browser to complete the DEP survey: http://survey.dep.state.fl.us/?refemail=Susan.C.Grandin@dep.state.fl.us

From: David Lambert [editor@southernersjournal.com]

Sent: Friday, March 01, 2013 9:45 AM

To: Grandin, Susan C.

Subject: david lambert signing in

Susan, hev -

Congratulations on this new great position. . .and thanks for fighting the good fight all these years.

I'll make this short. I need some quick advice or maybe a referral.

My small river, the North Withlacoochee is being flooded as I write this. That happens from time to time. Expected. It is a Florida Greenway River, with state forest and parks adjacent.

Problem is that the City of Valdosta Waste Management system has failed due to 'big rain,' and they are now dumping 5-6 million gallons of raw sewage into the river, with no end in sight until the floods go down.

Seems they have had plenty of time to clean up this problem, but haven't as yet. Hard to tell what the impact will be, but it's likely to taint all the wells up and down the river, create algae blooms, ruin fishing and swimming, and possibly have more serious impact.

I'm considering some doing something to their attention, maybe class action. Also considering starting a Friends of the North Withlacoochee River group to give us some clout.

I know you're busy and I'm not trying to slug your time. Does any of this fall under your domain? Any suggestions where I might start some process to get this outrage stopped?

Attaching a word file of latest news reports of raw sewage dump in North With to save you or whomever time.

See ya, and thanks for any help or suggestions.

David <a href="mailto:editor@southernersjournal.com">editor@southernersjournal.com</a>
904-403-5525

From:

Ammons, Brad

Sent:

Monday, March 04, 2013 7:48 AM

To:

Phillips, David

Cc:

Ammons, Brad; Horsey, Maurice

Subject:

FW: Meeting Yesterday (City of Valdosta, GA)

FYI. E-mail from City Manager after our Thursday meeting last week is below.

#### **Brad Ammons**

Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section
U.S. EPA Region 4
61 Forsyth St., SW
Atlanta, GA 30303
(404) 562-9769 (O)
(404) 562-9729 (F)
http://www.epa.gov/region4/water/wpeb/index.html

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From: Larry Hanson [mailto:lhanson@valdostacity.com]

Sent: Friday, March 01, 2013 6:04 PM

To: Ammons, Brad

Subject: Meeting Yesterday

Brad;

I wanted to take a moment to thank you for meeting with me yesterday regarding the City of Valdosta's wastewater issues. I hope I conveyed to you that we are committed to addressing these issues and are committed to working with you and/or EPD to define the projects, timelines and funding sources to resolve the problems associated with the Withlacoochee Wastewater Treatment Plant and the collection system that serves it. While we have experienced extensive and frustrating delays due to FEMA, we are ready now to move forward with the projects that we know need to be done. I also apologize that the current flood situation we are experiencing prevented our Director of Utilities and Deputy City Manager for Operations from attending the meeting yesterday.

As you suggested, I will follow up in 2 weeks and see what the status is of reviewing the information we submitted and the next step. I look forward to working with you as we resolve this matter.

Thank you again for your time yesterday and the professionalism you exhibited.

Thanks, Larry

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## Ammons, Brad

Subject: Location: Meet with City of Valdosta, GA re: WWTP/Collection System plans

150

Start: End: Thu 2/28/2013 10:30 AM Thu 2/28/2013 11:30 AM

Recurrence:

(none)

**Meeting Status:** 

Meeting organizer

Organizer:

Ammons, Brad

Required Attendees:

Phillips, David; Horsey, Maurice



LARRY H. HANSON
City Manager

P. O. Box 1125 216 E. Central Avenue Valdosta, GA 31603-1125

(229) 259-3500 Fax (229) 259-5411 E-mail: hanson@valdostacity.com

#### Maurice:

The City Manager and Public Works Director are in town this Thursday and wanted to just stop in and discuss their plans for the entire wastewater system (collection and treatment) after the 2009 flooding there. FYI, the City Manager just told me that they have received over 12" of rain since last Friday (2/22/2013) and the Withlacoochee River is already on their WWTP site and the river isn't supposed to crest for another day or two. The City Manager will still meet with us, but the PW Director may have to stay if the WWTP gets flooded.

This is a "listen only" meeting. Doug has already told them that any resulting enforcement would probably be federal.

**Brad** 

2009 - located there for 40 yrs. Metcalf + Eddy on-site for upgrade day of flood. Withlacoochee of Little Rivers join just north of wwTP.

2009 - Fed - State declared disasters. FEMA originally proposed 40' wall around ww.P. FEMA denicd its own claim. 100 yr flood phin re-defined to incl. WWTP. 2/3 of service population flows to this WWTP. City & FEMA wrote 2nd claim to move the WWTP. FEMA RY hired their own expert & FEMA employee the WWTP. FEMA RY hired their own expert & FEMA employee to write an eligible claim. FEMA ruled only cost-effective, feasible up tion was to move the wwTP (out of 4 options).

2010 - EPD had prepared a CO. EPD held off due to automatic denial of FEMA # if a CO is issued. City completed

all work in CO except WUTP move + moving wits FM. Have spent AHOM for upgrade of other WUTP. (GEFA approved loan

\*32 M - FM Proj. (+ new headworks + EQbasia) - expect to bid in July 2013
\$20M - Remainder of WWTP work - GEFA loan using design/build.

- . Have raised rates (every year for next 4 yrs each July).
- -> SPLOST failed due to unincorp. County vote (it passed in every City district)
- -> City is working an getting Most (Munic. Option Sales Tax) pushed thru Legislature

  Est. tax = \$20M/yr for 5 yrs. (if Most passes). Can only use for water escent.

  -> City's bill confugpplies to Fed. disaster facilities + is under a Co from Fed or State.
- > City proposing new FEMA claim for this past weekend's flooding (for repetitive flooding since 2009).
- -> City believes they can do WWTP/FM work in 3-4 years.



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Stormwater Monitoring:

Buy, Rent Sampling and Monitoring Equipment at 1/2 off new prices www.iscu-repair.com



## Valdosta reports major spill in the Withlacoochee River

You and one other recommend this. One person recommends this.

Posted: Feb 25, 2013 11:16 AM EST Updated: Feb 25, 2013 11:16 AM EST

Information from the City of Valdosta-

Over the two day period of Feb. 22-23, 2013, the Valdosta area received approximately six inches of rain. Inflow and Infiltration of stormwater into the sanitary sewer collection system have caused high flow conditions at the wastewater treatment plants.

The high flow at the Withlacoochee Water Pollution Control Plant (WPCP) caused a hydraulic overload of the secondary system with a resulting loss of secondary solids into the plant effluent. The total suspended solids result from the effluent sample collected on Saturday, Feb. 23 was 172 milligrams per liter. This is greater than 1.5 times the seven day average allowed by the National Pollutant Discharge Elimination System (NPDES) permit, which constitutes a

The volume of the major spill into the Withlacoochee River is the total flow for Feb. 23, which is 9,047,000 gallons. The City of Valdosta is currently having a system of pump stations and force mains designed that will replace the existing 52" gravity main that runs along the river basin to deliver flow to the Withlacoochee WPCP. This will greatly reduce the effects of river flooding on the collection system.

The city is also having a new headworks facility and equalization basin designed for the Withlacoochee WPCP that will reduce the effect of inflow and infiltration on the plant processes. Both of these designs are 60% complete. During the federally declared disaster flood of 2009, one-third of the Withlacoochee facility was under flood waters.

The City of Valdosta plans to move the facility to a higher elevation to prevent future flooding. This move will allow the plant to be completely redesigned and re-built. These three projects should remove the potential for hydraulic overflow due to inflow and infiltration in the future.

The City of Valdosta is currently seeking revenue sources to allow the completion of these necessary projects. Upstream and downstream sampling of the Withlacoochee River is being initlated on Feb. 25.

For more information, contact Environmental Manager John Waite at (229) 259-



## **TADVESTISFMENTS**

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The reign of the "King of Retail" is over. The Wall Street Journal reports an up-and-coming rival is growing sales at double the pace of Wal-Mart. Get its name report called "The Death of Wal-Mart."

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**Peanut Corporation of** America

Robbery suspect prompts chase through Albany WITH VIDEO



#### FROM THE AP



#### Oscar fashion

Check out the best and worst fashion choices from the Oscar red



3592 or at jwaite@valdostacity.com.

Albany Mardi Gras

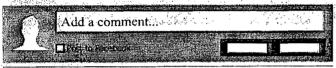
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Atlanta: New trick allows Georgia drivers to get auto insurance as low as \$9



Surprisingly simple solution to help your joints. See why these ingredients are flying off shelves

HOME LOCAL NEWS WEATHER VIDEO ABOUT WALB

From:

Denisse Diaz < Diaz. Denisse@epamail.epa.gov>

Sent:

Friday, February 15, 2013 1:24 PM

To:

Phillips, David

Subject:

Re: FW: Valdosta 308 Response

Thanks.

Denisse D. Diaz, Chief Clean Water Enforcement Branch Water Protection Division (404)562-9610

David Phillips---02/15/2013 01:22:23 PM---Fyi, I've given this to Yvonne to mail as you requested. David

From: David Phillips/R4/USEPA/US

To: Maurice Horsey/R4/USEPA/US, Denisse Diaz/R4/USEPA/US

Date: 02/15/2013 01:22 PM

Subject: FW: Valdosta 308 Response

Fyi, I've given this to Yvonne to mail as you requested.

#### David

2-9773

CONFIDENTIALITY NOTICE This message is intended exclusively for the individual(s) or entity(ies) to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

----Original Message----

From: Jane Hendricks [mailto:Jane.Hendricks@dnr.state.ga.us]

Sent: Friday, February 15, 2013 12:53 PM

To: Phillips, David

Cc: Kim Hembree; Marzieh Shahbazaz
Subject: Re: Valdosta 308 Response

Kim Hembree. Thanks.

Jane

>>> "Phillips, David" < <a href="mailto:Phillips.David@epa.gov">Phillips.David@epa.gov</a>> 2/15/2013 12:47 PM >>> Tane

We're ready to send over a copy of the response package; to whom should it be addressed?

David R. Phillips 404-562-9773

CONFIDENTIALITY NOTICE This message is intended exclusively for the individual(s) or entity(ies) to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any

part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

Von,

Please mail package to:

Ms. Kim Hembree Georgia Environmental Protection Division Permitting, Compliance, and Enforcement Program 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

2013 FEB 15 P 1:18

Themka David

From:

Jane Hendricks [Jane.Hendricks@dnr.state.ga.us]

Sent:

Friday, February 15, 2013 12:53 PM

To:

Phillips, David

Cc:

Kim Hembree; Marzieh Shahbazaz

Subject:

Re: Valdosta 308 Response

Kim Hembree. Thanks.

Jane

>>> "Phillips, David" <<u>Phillips.David@epa.gov</u>> 2/15/2013 12:47 PM >>> Jane,

We're ready to send over a copy of the response package; to whom should it be addressed?

David R. Phillips 404-562-9773

CONFIDENTIALITY NOTICE This message is intended exclusively for the individual(s) or entity(ies) to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

Henry Hicks
DIRECTOR OF UTILITIES

November 23, 2012

David	Phillips, Enforcement Officer		2012			
U.S. E	nvironmental Protection Agency, Region 4		AON			
Clean	Water Enforcement Branch		2			
<b>61</b> Fo	rsyth Street		۔ ف			
Atlanta, Georgia 30303-8960						
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RE:	Information Request – Section 308 of the Clean Water Act		5			
	National Pollution Discharge Elimination System Permit Nos. GA0033235 and GA0020222					
	Withlachoochee River Wastewater Treatment Plant and Mud Creek Wa	astewate	r Treatment			
	Plant		•			

#### Dear Mr. Phillips:

Please allow this letter and the corresponding attachments to serve as the response to your information Our Utilities Department has worked diligently to prepare and compile the extensive request. information requested. Preceding the formal response below, I would first like to take the opportunity to summarize the events in Valdosta and the tremendous amount of work that has taken place in the last several years and is continuing at a very intense pace. We have dealt with some extraordinary circumstances since suffering severe system damage from a Presidentially declared flood disaster in April of 2009. We acknowledge our sewer and collection system has needs and inadequacies and we have given the highest priority over the last several years to address these matters. flood and the damage it caused to the Withlacoochee Plant and collection system, FEMA was brought in and over the period from 2009 to February 2012, FEMA prepared and then subsequently denied three claims for repairs to the Withlacoochee Plant and its collection system. FEMA failed in each case to respond to the city's claims, prepared by FEMA, within the timelines required. The city made every effort to get FEMA to act, involving members of Congress, the state of Georgia through GEMA, along with making trips to FEMA Region IV in Atlanta and FEMA Headquarters in Washington asking for their help and trying to get an answer. FEMA regulations prohibited the city from making any substantial repairs to the Withlacoochee Plant or damaged collection system until FEMA made a final ruling, or the claim would be rendered ineligible. As you will read from the letters of Charley English, Director of the Georgia Emergency Management Agency, and others, the city was a victim of FEMA's failure to act within their mandatory timelines, as well as their peculiar process to prepare each of the city's claims, declare the claims as eligible, and then deny the year staff prepared. Again, we recognize

the city's system has issues that need immediate attention and we have numerous examples to show that significant attention has been given to these issues and much progress made. I do want to mention some of the significant accomplishments that have been made or are underway, while also recognizing the city was prohibited by FEMA regulations from making any repairs to the Withlacoochee Plant and its collection system from April 2009 until May of 2012. However during this period of time the city took many actions to prepare for repair and/or replacement of this plant and its collections system, These actions include purchase of land for relocation of the plant, design of a new force main, headwork's facility and equalization basin to eliminate overflows and spills in the collection system and at the plant, intent to apply to GEFA for loan funds for the projects, requests to and approval from GEFA and EPD to use a design/built approach for these projects to accelerate construction, adoption of a Water and Wastewater Rate Sufficiency Rate Study including five year rate increases for system users, completion of the modernization and expansion of the Mud Creek plant, significant amounts of manhole replacement, lift station replacement, sewer line rehabilitation and replacement, and other repairs to address known system deficiencies. We are and remain fully committed to addressing the system's needs and it is my hope that upon reviewing the information included, you will agree with that assessment. With the Mud Creek plant complete and operating very well, and with the final decision by FEMA allowing the city to move forward and address the Withlacoochee Plant, we are moving forward with a sense of urgency and priority. The new forcemain project is approaching 75% design completion, right of way acquisition has been approved and is underway, GEFA applications for funding are being prepared for December 2012 submittal, and a project delivery method to accelerate construction has been tentatively approved by GEFA and EPD.

We are fully committed to addressing our wastewater's systems needs and also to achieve compliance with regulatory requirements as well as achieve our goals and responsibility for environmental stewardship.

Enclosed please find the following attachments:

**Attachment A** is the original request for information document by Denisse D. Diaz dated October 23, 2012.

**Response to 1.a.** - The Sanitary Sewer System has a total of approximately 300 miles of sewer lines ranging from 4 to 54 inches in diameter. Of the 300 miles of sanitary sewer lines approximately 200 miles serves and Withlachoochee Wastewater Treatment Plant service area and the remaining 100 miles serves the Mud Creek Wastewater Treatment Plant service area.

Response to 1.b. – see Attachment B lift station listing

**Response to 1.c.** - There are no known constructed overflows or unpermitted discharge points to the best of our knowledge.

Response to 1.d. – The average design flow of the City of Valdosta's WWTPs are as follows:

Withlachoochee WWTP - 8.0 MGD

Mud Creek WWTP - 3.22 MGD

Response to 1.e. – The peak design flow of the City of Valdosta's WWTPs are as follows:

Withlachoochee WWTP - 17.0 MGD

Mud Creek WWTP - 8.02 MGD

Response to 1.f. – The annual average flow of the City of Valdosta's WWTP are as follows:

Withlachoochee WWTP - 1971.0 MG

Mud Creek WWTP - 839.4 MG

Combine total = 2810.4 MG

**Response to 1.g.** - The population of the City of Valdosta is about 56,000 persons with the Withlachoochee Plant providing services to 67% of the population and the Mud Creek Plant serving the remaining 33% of the population.

Response to 2.a. through j. – See spreadsheet in attached CD ROM.

**Response to 2.k.** – While the spreadsheet on the CD ROM gives fairly simple explanations to individual events, specific details are discussed below due to the complexity of the overall action plan in place.

A review of the spreadsheet clearly shows major contributors to SSO's and permit violations at the WWTPs and they are in order of volume (ranked from highest to lowest total volumes):

- Inflow and Infiltration due to wet weather or major storm events causing hydraulic overloads to the wastewater treatment systems at the Withlachoochee WWTP which lead to permit violations.
- 2. Inflow and Infiltration due to wet weather or major storm events causing SSO's in the collection system mostly prevalent in the Meadowbrook area of the Withlachoochee collection system.
- 3. Mechanical Failure of equipment at Lift Stations and WWTPs especially the Withlachoochee WWTP.
- 4. Infrastructure Failures mostly to sewer manholes and some sewer mains.
- 5. Blockages related mostly to FOG (fats, oils and grease).

Corrective actions to prevent future occurrences for items number 1 and 2 above are being addressed on a two phased approach. Phase 1 is to construct 3 new lift stations with a new force main to the Withlachoochee WWTP along with a new headworks receiving structure (including grit removal and bar screens) as well as a 4.0 MGD flow equalization basin at a location not prone to floods. This work is the main deviation from the long term CIP rehabilitation and replacement plan developed from CDM's 2010 Condition Assessment and Criticality Report (also included on the attached CD ROM).

The original recommendation was to CCTV and rehabilitate the 54-inch gravity main to the Withlachoochee WWTP and build an EQ Basin on existing plant site. This recommendation was not approved by city staff, in that this 54-inch gravity line is highly prone to I&I even during minor flood events due to associated manholes being lower than flood stage as well as the location of the plants main influent pump station which is also highly prone to floods. This decision also included historical information (see Flood History document included on CD ROM) at the Withlachoochee WWTP regarding past flood events as well as the 2009 federally declared disaster in which the bottom third of the plant was submerged in flood waters with the exception of the influent pump station. The only reason the influent pump station did not flood was because of an extraordinary effort by city staff, local contractors and volunteers to expand an existing earthen berm over several days to protect that pump station (see pictures in Attachment C). If the influent pump station had become submerged, the entire treatment plant would have been rendered useless for several months. In addition, the rehab of the 54-inch gravity would not alleviate SSO's in the Meadowbrook area which are attributed to a bottleneck in the sewer collection system where three main trunk lines come together into the 54-inch main. Due to this bottleneck sewer and I&I from elsewhere in the system back up into the Meadowbrook area. The force main project would eliminate this trunk line and the bottleneck. 30% design for the lift station, force main, headworks and EQ Basin project was approved by City Council in September 2010 and completed in 2011. Associated documents for this work are included on CD ROM. Since the 100% design work scope was included with the relocation of the Withlachoochee Plant in the City's Hazard Mitigation Proposal (HMP) to FEMA following the 2009 Federal Disaster Declaration and as such any further expenditures on either the force main project or relocation of the plant would not be eligible for FEMA funding if completed before the final approval or denial of the HMP by FEMA. As a result of this, the City of Valdosta did not proceed with 100% design on the force main project, but did acquire 70 acres of land for the relocation of the plant in the future. This site would also be used for the new headworks and EQ Basin portion of the overall force main project once constructed. On July 27, 2012, the City was notified of FEMA's denial of our final appeal for the new plant and force main project. On August 9, 2012, the City Council authorized moving forward on 100% design for the pump station, force main, EQ Basin and new Headworks project. Finally, the City of Valdosta is in the process of applying for \$50 million in funding through GEFA for the construction of the Force Main Project and Relocation of the Withlachoochee WWTP.

In conjunction with the above efforts, additional corrective actions were undertaken to address items number 3 through 5 above. With respect to SSO's and lift station, In December 2010 City Council Authorized the replacement of four lift station all of which were contributors to major SSO's. This work was completed earlier this year and four additional lift stations will be bid out for replacement later this year. Regarding mechanical equipment failures at the Withlachoochee WWTP, from September 2010 to present over \$5.5 million was expended for equipment and infrastructure repairs with the majority used on the Withlachoochee Collection System and mostly at the Treatment Facilities. See attached Chronology of Council Action regarding SSO's and Permit Violations in Attachment D. We also have implemented a phased program for the replacement or rehabilitation of severely deteriorated manholes and associated piping. To date, two phases of the manhole rehab program have been completed and the third about to be put out for bids.

Cured in place liners have been utilized for the worst sewer mains in conjunction with ongoing contracted CCTV work to identify problems in the sewer collection system. To date both the Knights Creek and Mud Creek trunk lines have been evaluated as well as several other smaller areas listed in the CIP Plan. Currently, the entire Big Country Club lift station service area is being CCTV'd for I&I. A FOG ordinance was adopted in April of 2010 to address SSO's related to grease blockages.

Response to 3. - See Attachment E

Response to 4.a. through f. – See Attachment F for SSO Measurement and EPD correspondence packet. Also included on CD ROM is 04292010 SSO Summary document on additional procedures.

Response to 5. - below

## **SSO or Permit Violation Reporting Structure**

Detected as a result of a citizen complaint or field investigation by staff.

Reported to John Waite, Environmental Manager

- 1. John contacts appropriate authorities to notify of violation, time and location.
- 2. John gathers all information and writes preliminary report as well as draft press release and public notice (if necessary) for review by Director.

Preliminary report, draft press release and public notice (if necessary), are submitted to Henry Hicks, Utility Department Director for review.

1. Request clarification or additional information if necessary before submitting to Assistant City Manager, John Whitehead III and City Manager, Larry H. Hanson for review, questions, clarifications, etc. and final approval.

Upon final approval by City Manager, press release and public notice are forwarded to Valdosta Public Information Coordinator, Samantha Mathews for release to media and newspapers.

John Waite submits final follow up report and data to Utility Director for review and approval before submitting to EPD.

In closing, it is important to note that many other improvements have been implemented within the sewer system that did not require City Council approval as well as well over a million dollars spent on emergency repairs within the sewer collection system. This total also does not include the \$40 million dollars spent on the Mud Creek Wastewater Plant expansion and rehabilitation project, nor the several million dollars expended on water system improvements during this same time frame.

This July we implemented rate increases, on average 5% per year, to allow the department to stand alone on its rates without utilization of SLOST funding at the end of the five year period while attaining a minimum 1.25 coverage ratio.

We have many improvements still to make and significant objectives to meet over the next 20-years with the most important one being the relocation of the Withlachhocchee Wastewater Treatment Plant to a much higher elevation to avoid another in evitable flood.

Finally, this summary covers mostly capital intensive expenditures and does not cover the numerous organization changes made within the department to improve the efficiency and effective of the organization as well as many initiatives still in progress. The success of these programs and initiatives are clear in that the number and severity of SSO's and permit violation are staring to decrease in frequency and size.

If additional supporting documentation is required or other information needed, please let us know as soon as possible.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Respectfully submitted

**Director of Utilities** 

City of Valdosta, GA.

# **Attachment A**



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 2 3 2012

## <u>CERTIFIED MAIL</u> 7012 1010 0001 8097 0689 RETURN RECEIPT REQUESTED

City of Valdosta
Attn: Mr. Larry H. Hanson
City Manager
216 East Central Avenue
P.O. Box 1125
Valdosta, Georgia 31603-1125

Re: Information Request – Section 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit Nos. GA0033235 and GA0020222
Withlacoochee River Wastewater Treatment Plant and Mud Creek Wastewater Treatment Plant

#### Dear Mr. Hanson:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency, Region 4 hereby requests the City of Valdosta (the City) to provide the information set forth in Enclosure A regarding the wastewater treatment plants noted above and their associated sanitary sewer collection systems. The City is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Mr. David Phillips, Enforcement Officer
U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The City's response to this information request should specifically reference the particular section and number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible City of Valdosta official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic) which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place, as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch at the U.S. EPA, Region 4.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

Also enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet*, which may assist you in understanding the compliance assistance resources and tools available. However, any decision to seek compliance assistance at this time does not relieve the City of its obligations to the EPA or the State of Georgia, does not create any new rights or defenses, and will not affect the EPA's decision to pursue enforcement action.

Please feel free to contact Mr. David Phillips, Enforcement Officer at (404) 562-9773 or by email at phillips.david@epa.gov, if you have questions regarding this notice and information request.

Sincerely

Denisse D. Diaz, Chief

Clean Water Enforcement Branch

Water Protection Division

#### Enclosures

cc: Ms. Jane Hendricks
Georgia Environmental Protection Division

Mr. Sheldon Irvin Valdosta, Georgia

#### **ENCLOSURE A**

## SSO PROGRAM City of Valdosta, GA

## 1. Provide the following:

- a. The size of the City of Valdosta's Sanitary Sewer Collection System (SSS) (linear feet or miles);
- b. A list of the pump stations in the SSS, including size (gpm), and indicate if back up power is available and if it is adequate to fully operate the pump station;
- c. A list of all constructed overflow points (any unpermitted constructed discharge points) in the SSS (including pump stations) prior to the headworks of the City of Valdosta's WWTPs;
- d. The average design flow of the City of Valdosta's WWTPs;
- e. The peak design flow of the City of Valdosta's WWTPs;
- f. The annual average flow of the City of Valdosta's WWTPs; and
- g. The population served by the City of Valdosta's WWTPs and their respective SSSs.
- 2. For purposes of this Information Request, a sanitary sewer overflow (SSO) is an overflow, spill, release, or diversion of wastewater from the SSS. SSOs include overflows or releases of wastewater that reach waters of the United States (U.S.); overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO.

Provide a listing of all SSOs that occurred from September 2007 to the present. For each SSO provide the following:

- a. Date(s) of the SSO;
- b. Time (and Date if other than a. above) when the City of Valdosta was notified that the SSO event occurred;
- c. Time (and Date if other than a. above) when the City of Valdosta (or contractor) crew responded to the SSO;
- d. Time (and Date if other than a. above) when the SSO ceased;
- e. Time (and Date if other than a. above) when corrective action was completed;
- f. Location of the SSO, including source (pump station, manhole, etc.);
- g. Ultimate destination of the SSO, such as surface waterbody (by name, if available), storm drain leading to surface waterbody (by name, if available), dry land, building, etc.;
- h. Volume of the SSO:
- i. Cause of the SSO such as grease, roots, other blockages, wet weather (infiltration and inflow), loss of power at pump station, pump failure, etc.;
- j. Corrective actions taken to stop the SSO; and
- k. Corrective actions taken to prevent this or similar SSOs in the future.

If available, please provide the above information in a Microsoft compatible spreadsheet format.

3. If the City of Valdosta has a formal written plan for responding to, addressing, and reporting

SSOs (i.e., a Sewer Overflow Response Plan ("SORP")), provide a copy of the plan.

- 4. Provide a copy of any additional City of Valdosta procedures not included in the SORP (as referenced in Question 3 above) for the following activities:
  - a. Documenting SSOs;
  - b. Estimating SSO volume;
  - c. Identifying root causes of SSOs;
  - d. Containment and clean-up of SSOs, including any specific procedures addressing backups into buildings caused by mainline problems;
  - e. Identifying wet weather related SSOs and reconnaissance of these during rain events; and
  - f. All reporting of SSOs to the permitting authority, the State of Georgia.
- 5. Provide the name of the person (or position title) responsible for each of the activities indentified in the City of Valdosta's SORP and/or listed in Question 4 above.

#### **ENCLOSURE B**

## RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS (40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). Method and time of asserting business confidentiality claim. A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.



## U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources, including workshops, training sessions, hotlines, websites and guides, to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

### **EPA's Small Business Websites**

Small Business Environmental Homepage - www.smallbiz-enviroweb.org Small Business Gateway - www.epa.gov/smallbusiness

EPA's Small Business Ombudsman - www.epa.gov/sbo or 1-800-368-5888

### **EPA's Compliance Assistance** Homepage

www.epa.gov/compliance/assistance/ business.html

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

## **EPA's Compliance Assistance Centers**

www.assistancecenters.net

**EPA's Compliance Assistance Centers** provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

### Agriculture

www.epa.gov/agriculture/

### **Automotive Recycling** www.ecarcenter.org

**Automotive Service and Repair** www.ccar-greenlink.org or 1-888-GRN-LINK

## **Chemical Manufacturing**

www.chemalliance.org

### Construction

www.cicacenter.org or 1-734-995-4911

#### Education

www.campuserc.org

### **Food Processing**

www.fpeac.org

### Healthcare

www.hercenter.org

### Local Government

www.lgean.org

### Metal Finishing

www.nmfrc.org

### **Paints and Coatings**

www.paintcenter.org

### **Printed Wiring Board Manufacturing**

www.pwbrc.org

### **Printing**

www.pneac.org

#### **Ports**

www.portcompliance.org

### U.S. Border Compliance and Import/Export Issues

www.bordercenter.org

### Hotlines, Helplines and Clearinghouses

www.epa.gov/epahome/hotline.htm

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

### **Antimicrobial Information Hotline**

info-antimicrobial@epa.gov or 1-703-308-6411

### Clean Air Technology Center (CATC) Info-line

www.epa.gov/ttn/catc or 1-919-541-0800

### **Emergency Planning and Community** Right-To-Know Act

www.epa.gov/superfund/resources/ infocenter/epcra.htm or 1-800-424-9346

### **EPA Imported Vehicles and Engines** Public Helpline

www.epa.gov/otag/imports or 734-214-4100

### **National Pesticide Information Center** www.npic.orst.edu/ or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills www.nrc.uscg.mil or 1-800-424-8802

### **Pollution Prevention Information** Clearinghouse (PPIC)

www.epa.gov/opptintr/ppic or 1-202-566-0799

### Safe Drinking Water Hotline

www.epa.gov/safewater/hotline/index. html or 1-800-426-4791

### **Stratospheric Ozone Protection Hotline** www.epa.gov/ozone or 1-800-296-1996

## U. S. EPA Small Business Resources

# Toxic Substances Control Act (TSCA) Hotline tsca-hotline@epa.gov or 1-202-554-1404

### **Wetlands Information Helpline**

www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828

### State and Tribal Web-Based Resources

### **State Resource Locators**

www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

# State Small Business Environmental Assistance Programs (SBEAPs)

www.smallbiz-enviroweb.org

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits. The website is a central point for sharing resources between EPA and states.

## EPA's Tribal Compliance Assistance Center

www.epa.gov/tribalcompliance/index.html

The Center provides material to Tribes on environmental stewardship and regulations that might apply to tribal government operations.

### **EPA's Tribal Portal**

www.epa.gov/tribalportal/

The Portal helps users locate tribal-related information within EPA and other federal agencies.

### **EPA Compliance Incentives**

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

### **EPA's Small Business Compliance Policy**

www.epa.gov/compliance/incentives/smallbusiness/index.html

This Policy offers small businesses special incentives to come into compliance voluntarily.

### **EPA's Audit Policy**

www.epa.gov/compliance/incentives/auditing/auditpolicy.html

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

# Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or go to their website at www. sba.gov/ombudsman.

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

### **Your Duty to Comply**

If you receive compliance ε istance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

# **Attachment B**

# **Lift Station SSO Information**

	GPM both	Backup Power		
Lift Station	pumps			
,		/		
Dillards	60	None .		
South Forty	. 70	, None		
Little Country Club	70	None		
Ridge Rd.	160	None		
Martins Pastry	166	None		
Airport #2	190	None		
Foodbank	200	None .		
Little Cherry	240	None		
Hyde Park	240	None		
Hwy 84	275	None		
Knights Mill	280	40kW Genset		
Hwy 94	300	None		
Rogers St	400	None		
Goodyear	406	None		
Mack Drive	483	None		
Ponderosa	600	None		
Tucker Rd	650	None		
Eastwind	750	None		
Big Cherry	750	None		
Pineview	1000	None		
Lakeland	1000	None		
Boys & Girls	1400	Non Functional Genset		
Big Country Club	1450	None		
Miller Park	1500	None		
Airport #1	N/A	None		
City Hall	350 estimated	None		
Toombs St	storm water	None		

<sup>\*</sup> Flow rates are calculated by doubling the GPM of each pump.

# **Attachment C**

**Final FEMA Appeal** 

Letter from Charley English of GEMA
Congressional Letters of support to FEMA
2009 Presidentially Declared Flood Pictures

### GEORGIA EMÉRGENCY MANAGEMENT AGENCY GEORGIA OFFICE OF HOMELAND SECURITY

NATHAN DEAL



CHARLEY ENGLISH DIRECTOR

February 15, 2012

Mr. Craig Fugate Administrator Federal Emergency Management Agency 500 C Street SW Washington, DC 20472

Dear Administrator Fugate:

The State of Georgia supports the appeal of the City of Valdosta for the reconsideration of the denied Project Worksheet(s) for proposed corrective measures of the damaged Withlacoochee Water Pollution Control Plant inundated with flood waters associated with the Spring 2009 Severe Storms and Flooding Disaster (DR 1833).

Further we request that the FEMA headquarters staff involved in the review of the City's second appeal give every consideration to the full body of materials developed throughout the entire course of this project including all damage assessments and all proposed corrective measures. Twice during the protracted review process associated with this project the City of Valdosta staff worked extensively with FEMA staff and FEMA technical specialists in reviewing the damages, identifying potential corrective actions and developing viable solutions. Twice City officials have seen those jointly developed assessments and proposed corrective measures subsequently reversed. Most frustrating has been the inability of FEMA to clearly enunciate the rationale for reversing its own staff recommendations.

We will soon reach the third anniversary of this disaster. The Withlacoochee Water Pollution Control Plant is still not repaired. The City has submitted a second and final appeal. The FEMA response to date has been contradictory, incomprehensible and dilatory at every step in the process. Accordingly, I respectfully request that the review of this appeal reverse the trend that has been established; and that it be decided and published within the ninety day limit established by 44CFR206.206. I also request the decision be clearly stated with supporting references to the CFR and FEMA policies in effect on the date of the declaration. Finally, I ask that FEMA extend to the City every consideration and etiquette that you would want extended to you had you been the chief elected official faced with this situation.

Honestly, the manner in which this project was handled has made the role of state and federal emergency management agencies in disaster recovery look terribly bad. The only hope we have in restoring some of our good reputation is by finishing well. I trust you will feel the



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### CITY of VALDOSTA, GEORGIA

February 1, 2012

Mr. Charlie English, Director Georgia Emergency Management Agency Georgia Office of Homeland Security Post Office Box 18055 Atlanta, GA 30316

Ms. Elizabeth Zimmerman
Deputy Associate Administrator, Response and Recovery
United States Department of Homeland Security
Federal Emergency Management Agency
500 C Street, Southwest
Washington, DC 20472

Reference: FEMA-1833-DR-GA

City of Valdosta, Georgia, Public Assistance I.D.: 185-78800-00 Second Appeal of Project Worksheet Number: 863 and all Version(s)

### Statement of Second Appeal Status:

In a letter received by the City of Valdosta on December 5, 2011, the State of Georgia Emergency Management Agency by and through its subordinate organization, the Georgia Office of Homeland Security, hereinafter "the Grantee," notified the City of Valdosta, hereinafter "the Sub grantee", that the Federal Emergency Management Agency, hereinafter "FEMA" had denied the City's first level appeal for, and including, its above captioned FEMA Project Worksheet together with its subsequent version(s). The Project Worksheet(s) and included narrative, prepared by Ron Bond, an outside, independent contractor hired by FEMA Region IV and Charlie Beck, FEMA Region IV Project Specialist, with the involvement and assistance of the City and a consulting engineering firm, analyzed four identified options for addressing the city's owned and operated Withlacoochee Pollution Control Plant, hereinafter "WPCP", and concluded the option to permanently relocate the City's WPCP was eligible, feasible and cost-effective under FEMA guidelines, policy, and protocols. Pursuant to 44 CFR §206.206, the City once again invokes its right to appeal the decision of the FEMA Region IV Regional Administrator, Major Phillip May by bringing forth the matter to the second-level appeal in further accord with the provisions of 44 CFR §206.206.

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As further provided by 44 CFR §206.206, the City herein recognizes and acknowledges the sixty (60) day prescriptive period by which to file its second-level appeal and, as evidenced by its filing date with the appropriate GEMA authority, attests its conformity with the corresponding prescriptive filing date.

#### Statement of Issues:

Pursuant to 44 CFR §206.222, §206.226 and §206.228, the City herein sustains itself as (1) an eligible applicant for FEMA Public Assistance and (2) the WPCP has been determined to be an eligible facility and (3) both the costs and work also are imputed as eligible. Additionally and as provided by FEMA Publication 322, Public Assistance Guide, the WPCP was indeed in service at the time of the onset of the disaster and was parcel to the initial FEMA Preliminary Damage Assessments. The WPCP facility and its assessed level of damage, as determined by FEMA by and through its Preliminary Damage Assessments, proved to be essential in sustaining and retaining the federal disaster declaration from the Office of the President of the United States.

Additionally and as defined by the Department of Homeland Security's National Infrastructure Protection Plan and its precipitating Critical Infrastructure and Key Resources program, the WPCP is clearly defined as a critical infrastructure facility, further underscoring the eligibility as prescribed by and through the auspices of the FEMA Public Assistance program.

Furthermore, the project is eligible and the existing facility cannot be substantially repaired as provided by the Lowndes County Unified Land Development Code, hereinafter "ULDC". This is due in part to the situation of the WPCP in a Specialized Flood Hazard Area, hereinafter "SFHA". A SFHA is defined as "the land covered by the floodwaters of the base flood on National Flood Insurance Program maps. The SFHA is the area where the National Flood Insurance Program's floodplain management regulations must be enforced and the area where the mandatory purchase of flood insurance is required." The ULDC issue finds convergence with 44 CFR §206.226 (d) and runs concurrent with FEMA Response and Recovery Policy Number 9526.1 "Hazard Mitigation Funding under Section 406 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act." Factually, the ULDC prohibits the reconstruction of any facility located in a SFHA. In addition, these and various other regulations prevent the feasibility of flood proofing individual structures, replacement of damaged structures, or on-site mitigation activities. Additional information of the continuity between the ULDC and prevailing FEMA policy will emerge at a later point in the second appeal pleading.

Because of the substantial construction preclusions related to the ULDC, since the flood event, the City and its WPCP is regularly out of compliance with regard to its discharge levels of toxicity of its wastewater effluent into the Withlacoochee River further prescribed by the United States Environmental Protection Agency and the State of Georgia's Environmental Protection Division. The City is therefore in violation of its federal and state permitting requirements and guidelines. The City and its citizenry sustained considerable health degradation as a result of a large spill of untreated sewage discharge into its community as an after effect of the declared event. Since the flood event, Georgia's EPD has held meetings with city officials and discussed imposing a consent order because the facility is unable to operate within its permit and the city is prohibited by FEMA guidelines and policy and the Lowndes County ULDC from making major

repairs that would be required to operate the plant within EPD permit requirements. The plant has incurred multiple reportable violations since the flood event, yet the city is unable to make the substantial improvements needed to prevent such violations as a result of the Lowndes County ULDC, a document that is binding on FEMA. In fact since the flood concluded and the plant began operating again as a damaged facility, the WPCP and its supporting infrastructure has incurred a total of 41 reportable violations. Of these, fifteen (15) occurred at the plant itself, including eight (8) major spills. The 8 major spills resulted in 86,625,000 gallons of raw sewerage spills into waters of both the state of Georgia, as well as the state of Florida. The average of these major spills is 10,828,125 per spill. FEMA staff concluded the plant "cannot be operated in a way to avoid "major spills"- releases of raw sewerage well above the 10,000 gallon threshold-during even minor flooding events." They concluded the plant will experience an average of 10.95 days per year of flood events leading to major spills. Damage from the flood event, along with the Lowndes County ULDC and FEMA regulations prohibit major repairs or substantial improvements to the plant. The flood event itself, which resulted in a re-defined 100 year floodplain, is the basis for the introduction of the Lowndes County ULDC, which prohibits the major repairs needed for the plant to operate in compliance. FEMA's project specialists noted in their narrative "a facility is eligible for replacement (i.e., has been destroyed) when it is no longer repairable. If it is not feasible to restore the function and capacity of the facility, if it is not repairable, it has been destroyed." The city agrees with the conclusion of FEMA's Project Specialist that the project to relocate the plant is cost-effective, feasible, eligible, and that the city is prohibited from making major repairs or substantial improvements to the existing plant.

### Statement of Facts:

Valdosta, Georgia is the county seat of Lowndes County, Georgia. As of the 2000 Census, the City had a total population of 43,724; by the 2010 census, the City had grown to 54,518. The WPCP was originally built in 1977 and expanded in 1988 as a 12.0 million gallon per day (MGD) capacity, with an average capacity of 6 MGD. The WPCP facility treats sewage for two-thirds of Valdosta's population and discharges treated effluent into the nearby Withlacoochee River. The plant's processes include coarse bar screening, influent raw wastewater pumping, raw wastewater grinding, grit removal, primary clarification, biological activated sludge process, secondary clarification, tertiary sand filtration, disinfection by chlorine gas, de-chlorination by sulfonation and effluent flow measurement and gravity outfall. Solids processing comprises aerobic digestion of primary and waste activated sludge, gravity thickening, belt-filter press sludge dewatering, and sludge drying bed dewatering. The later dry bed dewatering is a secondary and/or back-up method of processing solids.

The Withlacoochee River originates in central Georgia, northwest of Valdosta. It flows south through Berrien, Cook, and Brooks counties in Georgia and into Florida, and eventually merges with the Suwannee River at Suwannee River State Park west of Live Oak, Florida.

Severe storms and pervasive wide spread flooding occurred between March 27, 2009 and April 13, 2009 representing the precursor to the federal disaster declaration. The City and the entire Withlacoochee River Drainage Basin (1,450 sq. mile area) experienced an extensive, multi-day rainfall, receiving upward of 11 inches of precipitation and established a new level of recorded flooding. The WPCP encountered flows from throughout the drainage basin exceeding 25 MGD

of combined sewer and storm water and was inundated by river water from the Withlacoochee River, located approximately a quarter of a mile from the WPCP. The flood waters swept mixed liquor of suspended solids including Mixed Liquid Suspended Solids, a form of living masses of microbes that filters and digests wastes, from the secondary treatment area to the tertiary filters, plugging the WPCP tertiary filters.

Floodwater also flowed directly into the WPCP from the Withlacoochee River inundating and completely submerging the inactive drying beds, the WPCP chlorine disinfectant system, and sludge drying operation. The flood waters also consumed the maintenance shop within the confines of the WPCP. The influent pipeline was completely submerged under 20 feet of river water. The influent pump station, although temporarily protected by an emergency berm, was completely overwhelmed by flows in excess of 25 mgd (maximum reading of flow meter). The damage to these and related elements was severe. The disinfectant system was a total loss; the plant was unable to meet its United States Department of Environmental Protection Agency mandated National Pollutant Discharge Elimination System permit for a total of 9 days. Electrical infrastructure and equipment was short-circuited and continued to fail producing volatile conditions and an excessively dangerous work place for all flood response workers.

Raw sewage discharged from manholes near the river and its tributaries, and continued until the flood waters finally receded. The resulting hydraulic overload caused a short circuit of the secondary clarifiers with a resulting loss of biomass. These circumstances contributed to the previously referenced large spillage of untreated sewage introduced throughout the City. The spill volumes were calculated in accord with the permitting parameters of the WPCP which define and characterize a major spill as the effluent total suspended solids equal to or greater than 1.5 times the 7 day maximum average. The WPCP suffered a complete loss of function for 9 days and violated its mandated Environmental Protection Agency, and Georgia Environmental Protection Division National Pollutant Discharge System permit levels. Two critical sewer system pump stations, the Ponderosa and Big Country wastewater collection system apparatus, were also rendered inoperable by the declared event.

The influent raw wastewater pump station had an earthed dyke about its circumference. The dyke was hastily built in response to flooding events sustained by the City in previous years. On April 3, 2009 and concurrent with the declared event, flood waters began to reach the top of the dyke and emergency action was taken in an effort to control the flood and consequent damage. The City used force account labor, comprised of utility and other City departmental staff as well as troops from nearby Moody Air Force Base to fill and place sandbags along the top of the dyke in the City's most earnest efforts to prepare itself for the onslaught of flooding. By early morning the next day, the sandbags were nearly underwater and an additional and most aggressive temporary emergency effort was undertaken; dirt, sand and gravel, supplied by local contractors, were used to create an earthed berm on top of the dyke. Volunteer labor, including prisoners and college students continued work on the berm until the water receded beginning April 5, 2009. It was only through these extraordinary efforts that the plant was able to spare 2/3 of the City's business, commercial areas, hospitals, major university and residents from an environmental disaster.

### Statement of Inaccuracies in the FEMA Denial Letter of the City's First Appeal:

In its denial of the City's first-level appeal, Major Phillip May indicates that the City and not FEMA "proposed a mitigation measure to construct a floodwall at a cost of \$33,000,000 and that FEMA determined the floodwall was not cost effective and denied eligibility for this mitigation proposal." In a prior determination of the City's Hazard Mitigation Proposal, dated December 10, 2010, FEMA seemingly reversed itself by attesting that the City indicated they preferred not to build the floodwall but instead relocate the plant. The statement in the December 10, 2010 correspondence is incorrect in that the City was never provided any documentation noting its denial of the floodwall from the original Hazard Mitigation Proposal nor did the City, at any time, indicate it would not accept the floodwall if it was deemed cost effective by FEMA. Therefore, and with reference to the FEMA letter denying the first level appeal of the City, it was FEMA and not the City who first introduced the concept of constructing a wall around the circumference of the entire WPCP facility and imputed, albeit incorrectly, that the \$33,000,000 floodwall was feasible, cost effective and eligible.

Ostensibly, FEMA has denied its own Hazard Mitigation Proposal for the construction of a permanent floodwall around the circumference of the WPCP.

In the third paragraph of the first page of the FEMA letter denying the first level appeal in its totality, Major May contends that the City "requested (and) FEMA agreed to send a representative to inspect the facility to document any damages not captured in the original Project Worksheet, and to identify and document any potential hazard mitigation measures, included in the Subgrantee's (the City) request for facility relocation." In fact and as mentioned, City representatives met with Deputy Director of the Public Assistance Division (Todd Wells) and, as a result of this meeting, the Georgia congressional delegation, specifically Senators Saxby Chambliss and Johnny Isakson, and Congressmen Sanford Bishop and Jack Kingston jointly signed a letter to FEMA Administrator Mr. Craig Fugate requesting his review of the subject matter. Administrator Fugate offered to arrange a meeting between city officials and FEMA Region IV staff to review the matter. This meeting was held in Atlanta, Georgia and the FEMA Region IV staff volunteered to hire an outside, independent contractor to review the case, visit the site and work directly with a FEMA Region IV Project Specialist to review the matter and evaluate feasible options to assist the city with a valid and eligible claim. The city agreed to this offer with the expectation that FEMA Region IV would provide an internal and external expert to review the claim, write a valid proposal and recommend a project that was eligible, feasible and cost-effective. The city also had an expectation, as well as the members of Georgia's congressional delegation, that FEMA Region IV would accept the recommendations and conclusions of their own staff and their own paid, external expert. It is without dispute that FEMA Region IV summoned two individuals with prima facie wastewater treatment facility expertise in the formulation of Hazard Mitigation Proposals and the two FEMA representatives, purported to be Project Specialists, invested their time and performed exhaustive research and reached specific conclusions.

The results of their findings were included in a Version to FEMA Project Worksheet 863 Version 1 wherein their collective findings favored a relocation of the WPCP to an alternate site and, moreover, their findings were clearly articulated in an extensive submittal to FEMA Region

IV and, in essence, their empirically based conclusions provided a means to relocate the WPCP via feasible, cost-effective and programmatically eligible formulations. In all, the FEMA Project Specialists developed a total of four alternatives, vetted from engineering, feasibility, operations and maintenance, and regulatory mandates. Subsequently, the results of their collective vetting were filtered through the reasonable and customary FEMA Public Assistance matrices. Although four alternatives were initially considered, in their final analyses, the permanent relocation of the WPCP emerged as the most feasible, cost effective and eligible option.

The permanent relocation option considered the cost efficacies associated with the protection of the WPCP by moving it to a green field site outside and above the 500 year floodplain. The FEMA Project Specialist's calculations sustained the prevention of losses of function, valued at \$16,000,000 per annum and remove the propensities for raw sewage from contaminated flood waters from entering the waters of the State of Georgia. The proposed new plant relocation is considered to be in full compliance with all federal mandates and floodplain management regulations as well as operations and maintenance, permitting and in accordance with the Lowndes County Unified Land Development Code.

The remaining three options reviewed by the FEMA Project Specialist included (i) Elevation of critical WPCP structures; (ii) Concrete Berm; and (iii) Flood Proofing of the existing structures of the WPCP.

Elevation, while technically feasible proved to be grossly cost ineffective having a capital cost of some \$28,434,000 and an operation and maintenance cost of \$5,671,000 over twenty years and could not be legally implemented under the Lowndes County floodplain management ordinances.

The construction of a concrete berm to avert flooding from the Withlacoochee River together with an intricate series of pumping systems to evacuate storm water runoff and treated effluent over the top of the berm and directly into the Withlacoochee River system was also proven to be technically feasible. With an estimated capital cost of \$28,000,000, the measure could not be legally implemented under the Lowndes County floodplain management ordinances and would directly impact surrounding wetlands and would require Clean Water Act and United States Army Corps of Engineering permitting.

Flood proofing of all WPCP facilities throughout its campus required the relocation of the biosolids processing building and the construction of individual ringed levees. The mitigation measures proved not to be cost effective as the capital costs were estimated to levels above \$41,700,000 and would increase the operations and maintenance costs by approximately \$4,800,000 over a 20 year period. Further, the flood proofing measures could not be legally implemented under the Lowndes County floodplain management ordinances and would trigger inspections and permitting by the Occupational Safety and Health Administration due to the creation of confined spaces brought to the forefront by the very nature of flood proofing techniques.

Therefore, in the professional opinion of the FEMA Project Specialists, the most programmatically and operationally compliant option available was deemed to favor the

relocation of the WPCP due to its favorable cost benefit ratio, feasibility and eligibility. The remaining three options violate the Lowndes County Floodplain Ordinance, thereby making them ineligible for FEMA funding.

#### Discussion:

The basis of the city's appeal is that FEMA Region IV erred in their decision to deny their own staff's conclusions and to deny the appeal, without regard to the factual, specific and detailed analysis performed by their own staff that determined the project was eligible, feasible, and cost-FEMA's Region IV Project Specialist Charlie Beck and FEMA Region IV's independent, external expert Ron Bond analyzed all FEMA policy, guidelines, regulations, clarifications and Administrator memorandums specifically related to the project and concluded the project met all requirements for funding. Their report is included as an addendum to the appeal as supporting documentation. As provided by 44 CFR \$206.226 (g) (1 through 5), FEMA may, at the discretion of its leadership, "approve funding for and require restoration of a destroyed facility at a new location when: (i) the facility is and will be subject to repetitive heavy damage; (ii) the approval is not barred by any other provisions of title 44 CFR and (iii) the overall project, including all costs, is cost effective." (2) "When relocation is required by the Regional Administrator, eligible work includes land acquisition (costs), and ancillary facilities, such work as roads, and utilities, in addition to work normally eligible as part of a facility reconstruction. Demolition and removal of the old facility is also an eligible cost." (3) "When relocation is required by the Regional Administrator, no future funding for repair or replacement of a facility at the original site will be approved, except those facilities which facilitate open space used in accordance with 44.CFR part 9." (4) "When relocation is required by the Regional Administrator, and, instead of relocation, the (City) requests approval of an alternate project, eligible costs will be limited to 90 percent of the estimate of the restoration of the original location excluding hazard mitigation measures." (5) If relocation of a facility is not feasible or cost effective, the Regional Administrator shall disapprove Federal funding for the original location when he/she determines in accordance with 44 CFR parts 9, 10, 201, or subpart M of this part 206, that restoration in the original location is not allowed."

Recognizing that 44 CFR parts 9 and 10 contemplate Floodplain Management and Protection of Wetlands and Environmental Considerations respectively and that the restoration of the WPCP in its present geographical position will, without limitation, produce constraints to the FEMA Regional Administrator and his/her ability to allow restoration of the WPCP in its original location. Subpart M of Part 206 (a), mandates that, among other requirements, the City, as a condition of the receipt of FEMA Public Assistance funding under the auspices of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, "shall carry out any repair or construction to be financed with the disaster assistance in accordance with applicable standards of safety, decency, and sanitation and in conformity with applicable codes, specifications and standards." (b) "Applicable codes, specifications and standards shall include any disaster resilient building code that meets the minimum requirements of the National Flood Insurance Program." "In addition the {City} shall comply with any requirements necessary in regards to Executive Order 11988 and any other applicable Executive orders."

Executive Order 11988 requires Federal agencies to avoid, to the extent possible, the long and short-term adverse impacts associated with the occupancy and modification(s) of the floodplain and to avoid direct and indirect support of floodplain development whenever there is a practical alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by the floodplain in carrying out its responsibilities".

The City and its ambitions to relocate the WPCP and remove it from a SFHA, as a cost-effective, feasible and eligible means of effectuating a permanent relocation are further sustained by promulgation of the citations from the heretofore references from 44 CFR.

### Lowndes County Floodplain Ordinance:

The WPCP has been determined to rest in a SFHA, as further defined and applied by FEMA and its National Flood Insurance Program. The WPCP is located in Lowndes County, Georgia. Lowndes County is a political subdivision that has legislative authority to promulgate and enforce building, floodplain and other ordinances relative to the health and safety of the citizenry. The WPCP is subject to the county's Unified Land Development Code or "ULDC" and, as such, in order to complete the "plant expansion or substantial improvements to the existing WPCP and in accordance with the Lowndes County Unified Development Code Section 3.01.04.B-3, critical facilities shall not be located in the 100 year floodplain." The ULDC was adapted from the Georgia DNR/FEMA Model Flood Damage Prevention Ordinance.

The eligibility and feasibility of completing repairs to the damaged WPCP has been conclusively determined by Michael Fletcher, PE, and County Engineer for the Lowndes County Board of Commissioners. The city's WPCP is located in unincorporated Lowndes County, thus requiring the city to follow Lowndes County rules, regulations and guidelines, including the Lowndes County ULDC. The following quotes are from the city's initial appeal, written by FEMA project specialists. In referring to County Engineer Mike Fletcher and the ULDC, the following narrative is provided by FEMA staff. "He applied the ordinance to the plant by finding 1) that the plant is a critical facility, 2) that it is located in the 100-year floodplain, 3) that the disinfection system was a structure, and 4) that DR-1833 substantially damaged it. The Lowndes County ULDC does not allow new construction or substantial improvement of critical facilities in the 100-year floodplain and requires that they be assessable during a 500-year event. Based on this, he ruled that the city and FEMA may not comply with §9.11 by doing anything in situ. Since the disinfection system is a critical facility, the city and FEMA may only comply with §9.11 outside the 100-year floodplain, §9.11 requires that they be elevated or flood-proofed to the 500-year elevation. There is no question the plant as a whole is a critical facility. Here, the disinfection system also qualifies as a critical facility on its own. While the County Engineer allowed the plant to make emergency repairs to avoid an imminent risk to public health, he will not allow the facility to be flood-proofed in situ, because a critical facility may not be substantially improved in a 100-year floodplain. For FEMA to recognize this code, it must meet the provisions of 44 CFR 206.226(d). See 44 CFR 206.226(d) - (g).pdf. There are five criteria: Hence, one may fairly conclude the Lowndes County ULDC qualifies as a code within the meaning of 206.226(d). It is also binding on FEMA under 44 CFR9.11(d)(6) which reads: In addition to standards (d)(1) through (d)(5) of this section, no action may be taken if it is inconsistent with the criteria of the National Flood Insurance Program (44 CFR part 59, et seq.) or any more restrictive Federal, State, or local floodplain management standards." Based upon this decision, vested in the authority of the County Engineer through the ULDC, and the conclusion by FEMA Project Specialist that it is binding on FEMA, the city cannot substantially repair or flood-proof the damaged WPCP. As FEMA Project Specialist Charlie Beck concluded "if it is not feasible to restore the function and capacity of the facility, it is not repairable, it has been destroyed."

The City hereby acknowledges that the mere existence of the ULDC alone does not completely address the underlying Federal grant guidance so as to recognize local, regional, municipal or state ordinances as they stand without some in solido linkages to its Federal counterparts. As such, 44 CFR §206.226 (d) "Standards" are provided to ensure, among other warranties, that the City's recognition of the ULDC predated the declaration. Therefore, as articulated by 44 CFR §206.226 (d), "Standards" are necessarily tied to Federal grants arising from the FEMA Public Assistance process and must run concurrent with prevailing local, regional, municipal and or state ordinances that introduce the concepts of codes, standards and similar terms to predetermine minimum requirements. For the purposes of clarity, the City understands that "the costs of Federal, State and local repair or replacement standards which change the predisaster design construction of {a} facility to be eligible, the standards must (i) apply to the type of disaster repair or restoration required; (ii) be appropriate to and for the predisaster use of the facility; (iii) be found reasonable, in writing, and formally adopted and implemented by the State or local government on or before the disaster declaration date or be a legal Federal requirement applicable to the type of restoration; (iv) apply uniformly to all similar types of facilities within the jurisdiction of {the} owner of the facility and: (v) for any standard in effect at the time of a disaster, it must have been enforced during the time it was in effect."

The City hereby asserts that the requirements set forth in CFR §206.226 (d) were and did predate the onset of the Federal declaration. Such an assertion therefore sustains the continuity of the Federal prerequisites to those of the State of Georgia and its ULDC ordinances. Further, and in consideration of the ULDC, the City is indeed and factually precluded from returning the WPCP to its predisaster design, condition and function within the parameters of its situation in the SFHA.

### Loss of Function:

Because the economic damages from complete loss of wastewater treatment are not monetized in the marketplace, FEMA's benefit cost engineers commissioned a study to determine the value of wastewater service to society and found it to be \$41 per person served by the system per day. The study used the same methodology used to monetize utility outages for the HAZUS program. These are damages sustained by society at large, not damages sustained by the city or the plant. In evaluating damage reduction, the full data module and the current software both allow such damage to third parties to be included in the analysis. Per FEMA's direction, the City confirmed the loss of function factor of \$41 per person per day for the WPCP case by contacting the FEMA BCA Hotline (1-866-222-3580). With a population of 44,333 citizens of the City served by the WPCP, the loss of function cost as a result of loss of wastewater treatment is approximately \$1,800,000 per day.

Since this issue is critical for this project, it is important to examine the details of Recovery Policy 9526.1, Hazard Mitigation Funding under Section 406 (Stafford Act). Recovery Policy (RP) 9526.1 contains FEMA's guidance on how to determine cost effectiveness for the purposes of the Public Assistance Program. On August 13, 1998, FEMA consolidated several prior policies into RP 9526.1. It also noted an exception for Public Assistance (PA) to FEMA's policy at the time that all FEMA units were to use the same benefit cost analysis (BCA) methods. At the time of the 2009 spring floods, FEMA's most recent version of this policy carried the date July 30, 2007. The current date is March 30, 2010.

What the change to §VII.B.3 means is at issue. At the time of DR-1833-GA, the last sentence of §VII.B.3 read:

"The benefit cost analysis will be based on a comparison of the total project cost to the total cost of the following benefits: 1) damage to the facility and its damaged contents, 2) emergency protective measures required as a result of the damage, and 3) temporary facilities required due to the damage."

With the March 30 revision, the last sentence of §VII.B.3 now reads, (italicized):

"The benefit cost analysis will be based on a comparison of the total project cost to the total cost of the following benefits:

1) damage to the facility and its damaged contents, 2) emergency protective measures required as a result of the damage, 3) temporary facilities required due to the damage, 4) loss of function, 5) casualty (loss of life and injury, and 6) cost avoidance (damages avoided in the future due to mitigation measures)."

The Region concludes from this that the March 30, 2010 revision changed policy and the loss of function cannot be counted on projects funded by disasters declared prior to March 30, 2010. We disagree and assert for the following reasons. Removal of the sentence is not at issue. The sentence had made it essentially impossible to approve mitigation measures not covered by FEMA's BCA software unless they were measures expressly authorized by RP 9526.1. If the change had been a change to previous policy, implementing it would have followed the procedures in §VII.D.1 of 9510.1. If it was a mere clarification of existing policy, it was exempt under §VII.E. The procedures of §VII.D.1 include coordination by memorandum with the various Regional Administrators and by letter with the National Emergency Management Association, posting on the FEMA website with a request for comments and finally, a reconciliation of those comments. Research and the record shows no evidence that this procedure was followed. Hence, it is the opinion of the City, the March 30th revision was a mere clarification intended to minimize misinterpretation of existing FEMA policy.

The broad policy of using standard BCA methods throughout the agency has not changed since it was first formulated during response to the Midwest floods of 1993. The authorization to count loss of function damages has been a part of FEMA methodology since the early days of FEMA BCAs, at least since 1993. This policy demonstrates that, prior to DR-1833-GA, mitigation measures costing more than the preapproved measures could be justified using FEMA BCA

software. At the time, FEMA's BCA software allowed and encouraged documenting loss of function damages, and it had for at least 10 years prior to the disaster.

#### Partial WPCP Relocation:

In its attempt to remain as proactive as possible and, in the spirit of a series of good faith efforts on the part of the City, an alternative proposal to a total and complete relocation of the WPCP has been considered and is hereby offered for the purposes of the City's second appeal. Previously, a complete relocation of the WPCP out of the 100-year flood plain to a green field site was presented by the City as an eligible and cost-effective solution to any repetitive and future floods and provides the most feasible operations and maintenance solution (See Attachment 1). An alternative proposal (Attachment 2) considers the same end goals of promoting a feasible, cost-effective and eligible solution to the City's repetitive flooding events, but only considers relocation of plant elements directly impacted by the flood-water elevations that result in loss of function to the plant. Although more complex pumping and control mechanisms are required to operate a plant divided into two different locations, the solution is feasible and cost-effective with respect to mitigating against future flood threats to critical processes.

Consider that the area in and around the WPCP as well as many areas of the City receive approximately 0.93 flooding events per year above the 114 foot elevation as measured in the Withlacoochee River and flood waters are above the 114 foot elevation for an average of nearly 11 days per year. The City has conservatively estimated that 35,000 of its citizens discharge waste water to the WPCP. An additional 28,000 of the City's citizenry perform labor in their job locations throughout the area served by the WPCP. Presuming the 28,000 working citizens execute their work duties on an average of 8 hours per day, the dynamics associated with the calculations reveal that the WPCP serves an additional 9,333 people. As such, the WPCP serves approximately 44,333 citizens of the City.

The WPCP key component program entails the permanent relocation of its most essential processes currently constructed in the 100-year floodplain. These functional elements include the unit processes currently constructed within the 100 year floodplain and includes a pump station and force main system (to move flow into the alternative site from the existing waste water collection system), secondary clarifiers, filtration, disinfection, reaeration, biosolids dewatering facility and extension to the existing plant outfall to convey treated effluent to the Withlacoochee River. All of the foregoing components are proposed to be relocated to a green field site nearby the present configuration of the WPCP and outside of the 100 year floodplain elevation. Attachment 2 illustrates the layout of the components proposed in the alternate WPCP partial relocation plan for your convenience and is offered as a means to illustrate the City's proposal.

### Cost Considerations:

Although the City contends that the permanent and complete relocation of the WPCP is an eligible project and remains at the forefront of its desired end actions and the FEMA Public Assistance funding to assist its efforts in effectuating the relocation, the promulgation of the foregoing support a feasible, cost effective and eligible project.

The full and permanent relocation of the WPCP is estimated to cost \$88,650,000.

The alternative partial plant relocation of the key components damaged by the flood event and located within the 100 year floodplain is estimated to cost \$59,420,000.

### Conclusion:

The city is appealing the denial of the FEMA Region IV Administrator and requests approval and funding for the relocation of the WPCP at a total project costs of \$88,650,000. FEMA's own project specialists concluded such a project was feasible, cost-effective and eligible. This is the city's primary request.

In the event FEMA determines such a project is not eligible, feasible and cost effective, the city now provides an alternative approach to relocate those structures that were damaged by the flood event and those located within the 100 year flood plain to a site outside the 500 year floodplain. The city has determined and provided documentation that this alternative project will costs \$59,420,000.

These projects and their systemic linkages to the FEMA Public Assistance program are offered, by and through this comprehensive second-level appeal pleading to prove feasibility, cost-effectiveness and sustain their eligibility. The City respectfully requests the full reconsideration of the new facts that it believes will and should move FEMA toward the approval of the full or partial relocation of the critical WPCP facility.

Respectfully subparted.

John Gayle

Mayor

### Attachments:

- 1. Permanent Relocation Aerial View
- 2. Partial Relocation Aerial View
- 3. ULDC
- 4. Loss of Function
- 5. Photos
- 6. First Appeal Abbreviated Project Worksheet

### GEORGIA EMERGENCY MANAGEMENT AGENCY GEORGIA OFFICE OF HOMELAND SECURITY

NATHAN DEAL



CHARLEY ENGLISH DIRECTOR

January 11, 2012

Honorable John Gayle Mayor City of Valdosta Post Office Box 1125 Valdosta, Georgia 31603-1125

Dear Mayor Gayle:

The current policy of the State of Georgia is to provide ten (10%) percent of the eligible project costs for FEMA approved Public Assistance projects subsequent to a presidential disaster declaration. The 2009 Spring Severe Storms and Flooding Disaster (DR 1833), of which the city of Valdosta is an eligible applicant, qualifies for seventy-five percent (75%) federal funding assistance through FEMA for eligible disaster related costs. The remaining fifteen percent (15%) must be provided by the local applicant.

The State of Georgia fully intends to follow this policy with respect to approved Public Assistance projects associated with DR 1833, including the proposed corrective measures for the damaged Withlacoochee Water Pollution Control Plant. The potential cost of the proposed relocation of the damaged facility (\$94 million) necessitates, however, that the State require a twelve month notice from the time of any FEMA approval concerning this project. This time period will allow the City to engage the local state legislative delegation to request the 10% State match through the annual appropriation process and to provide the funding plan for the City's 15% share,

Please do not hesitate to contact me directly at 404-635-7001, or by email at charley english@gema.ga.gov, if I can be of any assistance or provide further information concerning this or any other GEMA related projects in which we have mutual interests.

Sincerely.

Charley English

cc: Larry H. Hanson, Valdosta City Manager
John L. Whitehead, Deputy City Manager, Operations

(EMAP)

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### CITY of VALDOSTA, GEORGIA

Larry H. Hanson City Manager

June 6, 2012

Honorable Sanford Bishop 2429 Rayburn HOB Washington, DC 20515-1002

Dear Congressman Bishop,

I feel compelled to write a letter to you in response to the letter you received from Administrator Fugate. The letter is in reference to the City of Valdosta's final appeal for the denial of a claim previously determined to be cost-effective, eligible and feasible by FEMA staff.

Let me begin by first thanking you for your unwavering support to the City in this long and frustrating process with FEMA. Your steadfast support and ongoing efforts to assist our city mean a great deal to us. You have always served our city and this community very well and I know that during my 17 years as City Manager, you have been extremely effective, always available, and your actions have always been consistent with your words. We truly appreciate you.

Administrator Fugate's letter makes several references to an apparent forthcoming decision to deny the City's final appeal. These references are disappointing in the sense that they are incorrect and in direct contradiction with FEMA's own staff who prepared the City's project worksheet. Assuming Administrator Fugate himself has not reviewed the case from its inception to the current final appeal; his words appear to merely repeat the inaccuracies and misrepresentations of the FEMA Region IV office. Our hope was and remains that a final appeal from FEMA headquarters will be pure, based solely on the facts, and not to support flawed opinions of the Region IV staff, who have denied a claim prepared by their very own professional staff and their own outside consultant, who together concluded the City's claim is eligible, cost-effective, and feasible. FEMA seems insistent on ignoring or distorting the facts, one can only assume so that they can deny the claim.

To the point, I will reference Administrator Fugate's statements and the facts as outlined in the appeal prepared by his staff.

Administrator Fugate's letter - "It's important to note that to meet FEMA eligibility requirements, a hazard mitigation proposal under the Public Assistance Program must be cost-effective and apply to damaged parts of the facility."

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Response - This appears to be phrased to let the City down easy and suggest the City's appeal, prepared by FEMA staff, is not cost-effective.

Recall that it was Administrative Fugate who directed the FEMA Region IV office to assist the City in preparing an eligible appeal. FEMA Region IV assigned Charlie Beck, Project Specialist, and hired Ron Bond, an external FEMA Consultant and expert, to prepare the City's appeal. The two of them concluded the proposed project to relocate the plant is eligible, cost-effective, and feasible. Administrator Fugate directed FEMA Region IV to assist the City with an eligible claim. FEMA Region IV assigned personnel and hired an external expert to prepare the appeal. The appeal they prepared concluded the project is eligible, is feasible, and is cost-effective. Then FEMA Region IV denies the appeal their own staff prepared and now Administrator Fugate suggests the project is not eligible, when in fact the FEMA Region IV Project Specialist and the FEMA Region IV external expert, that he indirectly advocated FEMA Region IV to utilize, both concluded the project is eligible.

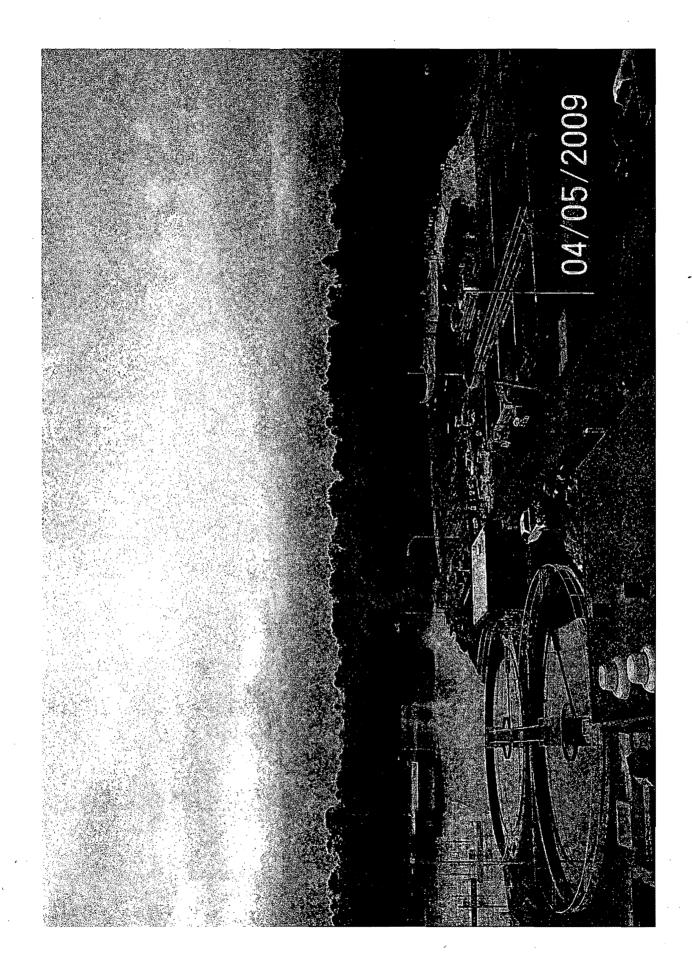
We are at wits end with this seemingly endless game of FEMA denying another claim from a presidentially declared disaster written by their own staff, FEMA then denying a second claim which Administrator Fugate directed Region IV to assist the City with, well after the deadline for responding to the appeal, and now Administrator Fugate indicating he plans to deny the final appeal, again after the deadline for responding has passed, suggesting it is not eligible, when in fact his own staff and external expert concluded it was eligible, feasible, and cost effective. We are extremely disappointed with the indifference FEMA has shown, the consistent dysfunction within FEMA, the consistent contradiction of FEMA denying FEMA, the consistent and blatant disregard for FEMA's own regulations regarding their allowed time to respond to a claim, and to FEMA's apparent ineptness.

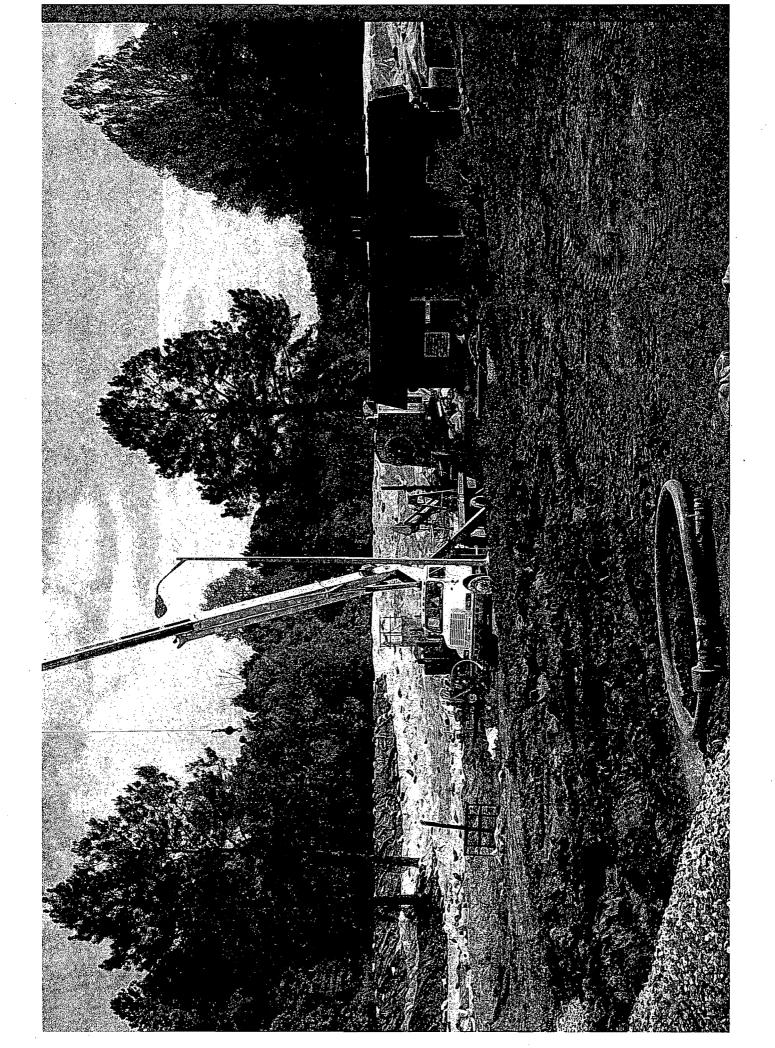
Please continue to assist us as you have; we deserve better treatment and a fair process from an agency of our government.

As always we appreciate you, your leadership, and your service to your constituents and to our country.

Sincerely,

Larry H. Hanson City Manager





# **Attachment D**

# Corrective Actions Authorized by City Council to Prevent SSO's, Permit Violations, etc. Since 2009

Most if not all of the following actions are best management practices outlined in CMOM manuals.

- July 2009 started implementation of Computerized Maintenance Management Software throughout the Utility Department to document and track all departmental activities including SSO's; water and sewer system repairs; equipment maintenance; Pretreatment Program; FOG Program; Backflow Program; updates to GIS data; etc. with main focus for future on prevention.
- January 2010 received CDM's Criticality and Condition Assessment Report on the Valdosta Sanitary Sewer System. Recommendations and CIP implemented with minor revisions.
- April 2010 Implementation of FOG (Fats, Oils, & Greases) Prevention Program. Main focus
  over first two years is Restaurants and Commercial Kitchens and will be followed by residential
  public education effort.
- September 2010 Final FEMA repairs made on biosolids conveyor and multi-media filters.
- September 2010 Authorized contract for 30% design on new force main, pump stations, headworks and equalization basin to replace I&I prone 54-inch gravity main to the Withlachoochee Wastewater treatment Plant and flood prone influent pump station at this facility. Scope include DDR and EID for review by GAEPD. 100% design would be placed on hold until all efforts to relocate the Withlachoochee Plant through FEMA had been exhausted. loo% design work was included in the FEMA HMP proposal.
- October 2010 Authorized CCTV evaluation of both the Mud Creek and Knights Creek main trunk lines feeding the Mud Creek Wastewater Treatment Plant. Evaluation found lines and manholes in good shape.
- October 2010 Authorized cleaning of the Withlachoochee influent pump station wet well
  including bypass pumping to complete work.
- December 2010 Purchase of 70 acres of land at higher elevation (54-feet above existing plant) for future relocation of the Withlachoochee Wastewater Treatment Plant in the near future as well as location for new Headworks and EQ Basin currently under design.
- December 2010 Authorized the replacement of 4 problematic sewer lift stations (Ponderosa, Big County Club, Mack Drive and Eastwind). Replacement consisted of conversion to submersible type stations with increased wet well capacity. Work also includes implementation of SCADA in all new or upgraded stations.
- January 2011 Adpotion of new Water & Sewer Standards and Specifications Manual with Details for all future construction work.
- March 2011 Authorized the replacement of the following major equipment at the
  Withlachoochee Wastewater treatment Plant: both Sludge Pumps, Roughing Tower Controllers,
  Nitrification Pumps, 3-Influent Pump Station Impellers, 6-RAS Pump Impellers, and RAS
  Controllers.
- April 2011 Implemented Phase 1 of a multi-year manhole replacement or rehabilitation program completing 30 of the most severely deteriorated manholes found to date.

- July 2011 received authorization to undertake a formal rate analysis with recommendation for approval and implementation by City Council.
- July 2011 designed and constructed new sewer lift station on Tucker Road to replace aging gravity main.
- October 2011 Major repairs made to belt press equipment at the Withlachoochee Plant.
- February 2012 Phase 2 of the Manhole Rehab/Replacement Program implemented with the next 30 manholes on list.
- May 2012 Goodyear lift station overhauled and upgraded.
- August 2012 Authorized CCTV work on the Big Country Club Pump Station service area to identify I&I issues.
- August 2012 Approved 100% design of new force main, pump stations, headworks and equalization basin project following FEMA denial of final appeal by the City of Valdosta.
- August 2012 Authorized emergency repairs to the Withlachoochee Influent Pump Station including replacement of broken 20-inch valve.
- September 2012 replacement of all SCADA radios to meet FAA narrow banding deadline.
- 2012 remaining projects Upgrade or replacement of 4 additional lift stations; Phase 3 of manhole rehab/replacement program.
- 2013 projects Piping and Blower replacement at the Withlachoochee Plant; Upgrade or replacement of 4 additional lift stations; Phase 4 of manhole rehab/replacement program; Acquire easements for force main project route; develop specification and bid document for force main, pump stations, headworks and EQ Basin project; and replacement of primary clarifiers at the Withlachoochee Plant

Other important major sewer related projects underway during this time frame were the Expansion and Rehabiltation of the Mud Creek Wastewater Treatment Plant; the extension of water and sewer services to numerous annexed islands per court order; and significant recovery efforts at the Withlachoochee plant following the 2009 flood event.

SORF

# **Attachment E**

# Standard Operating Procedure Sanitary Sewer Overflow Response and Reporting

The purpose of this document is to establish a standard procedure for responding to and reporting sanitary sewer overflows from the City of Valdosta collection system. All sanitary sewer overflows require immediate response to stop the overflow and secure the affected area to protect public health. All overflows must be investigated to determine the cause and any contributing factors. Finally, all overflows must be documented to fulfill regulatory requirements and to provide information for future collection system improvements and repairs. Any sanitary overflow that allows untreated wastewater to enter waters of the state must be reported to the Environmental Protection Division (EPD), to the local media, and to the health department as required under the Georgia Rules for Water Quality Control section 391-3-6-.05 Emergency Actions.

### I. Definitions:

"Major Spill" means any discharge of raw sewage that is (1) in excess of 10,000 gallons or (2) results in water quality violations in waters of the state.

"Sanitary Sewer Overflow" (SSO) means any discharge of untreated sewage from the municipal sewage collection system prior to reaching the wastewater treatment plant.

"Spill" means any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to waters of the state.

"Waters of the State" means any and all rivers, streams, creeks, branches, lakes, reservoirs, ponds, drainage systems, springs, wells, and all other bodies of surface or subsurface water, natural or artificial, lying within or forming a part of the boundaries of the state which are not entirely confined and retained completely upon the property of a single individual, partnership, or corporation. (O.C.G.A. 12-5-22)

### II. Identification of sanitary sewer overflow:

- A. When a report of an overflow is received a utilities department crew must be dispatched to confirm that an overflow does exist. If the report is received after normal working hours the standby crew must respond. Upon locating and confirming the overflow the responders must follow procedures to document the overflow and aid in determining the extent of the overflow. Supervisors responding to the overflow will be able to help collect information and will make sure that all needed information is gathered.
  - 1. Record the time that the release was discovered and the location
  - 2. Report the overflow to the Superintendent of Distribution, the Collections Supervisor, or the Environmental Manager.
  - 3. Advise the Collections Supervisor or standby supervisor of conditions and what equipment may be needed to stop the overflow

- 4. Check downstream manholes to locate the blockage
- 5. Document the overflow with pictures before removing the manhole cover, these pictures will be used to help estimate the rate of flow
- 6. Remove the cover from the manhole and measure the depth of the sewage as it flows over the frame, this will also be used to estimate the flow rate. If the cover cannot be removed, then measure the depth of the spout of water at the rim or at the pick holes. Make a note of the depth measurement and where it was taken.
- 7. Follow the sewage stream to determine if the sewage is reaching waters of the state or entering the storm sewer system
- 8. Document any place sewage is entering waters of the state or the storm sewer system with pictures
- 9. Make a note of the point that the sewage is entering waters of the state or the storm sewer system as closely as possible using temporary markers or by noting landmarks.
- 10. Inform the Superintendent of Distribution, the Collections Supervisor, and the Environmental Manager of any entry into state waters.

### B. When the overflow has been stopped:

- 1. The responders must document the time that the overflow stopped. The rate of the overflow in gallons per minute and the duration of the overflow in minutes will be used to estimate the total volume released in gallons.
- 2. The responding crews will make on site observations to determine the cause of the release. Any physical indicators such as rags, grease, broken pipe, etc. must be documented with photographs if possible.

### III. Site Cleanup

- A. Collect as much of the sewage as possible using the vacuum truck
- B. Gather and remove sewage related debris and organic solids from the area.
- C. Using a solution of household chlorine bleach, such as Clorox or Purex, spray the affected area. Let the disinfectant remain in place for at least one-half hour. Recommended dosage of chlorine bleach is ¾ cup of liquid bleach to 50 gallons of water or 1 tablespoon of liquid bleach to five gallons of water.
- D. Wash down the area

### IV. Reporting of overflows, spills, and major spills:

A. All overflows should be reported to the Environmental Manager so that a record can be kept of the location, amount, and cause of the overflow. Overflows that do not reach waters of the state will be on record with the Utilities Department. Any customers whose property is affected by the overflow should be told of the event and of all cleanup actions that have been done or are planned.

- B. If sewage does reach the waters of the state then reporting to the EPD is required, along with public notification. The required actions are listed in the Georgia Rules for Water Quality Control; section 391-3-6-.05 Emergency Actions.
  - 1. In the event of a spill: (less than 10,000 gallons released to waters of the state and no water quality violation)
    - a. The City must notify the EPD immediately by telephone or by FAX.

      Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
      - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
    - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
    - d. The City must report the same items to the Lowndes County Health Department, Environmental Division by telephone. This report is normally done by the Environmental Manager, but may be done by any supervisor or by the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.
    - e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the

- signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.
- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- 2. In the event of a "major spill" (over 10,000 gallons released or a water quality violation occurs) the same responses are required with some extra requirements:
  - a. The City must notify the EDP immediately by telephone or by FAX.

    Reporting by FAX is preferred because the person who needs to receive the report may not be available by telephone at the time of the report. FAX reporting is allowed by the EPD and will provide documentation that the report was made and when it was made. The initial report is normally made by the Environmental Manager, but may be done by any supervisor. A template to use for initial reporting is included with this document. The initial report must include:
    - 1. Date of the spill;
      - 2. Location and cause of spill;
      - 3. Estimated volume discharged and name of receiving waters;
      - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - b. The City must report the spill to the local media within 24 hours of becoming aware of the spill. The media report must include the same items;
    - 1. Date of the spill;
    - 2. Location and cause of spill;
    - 3. Estimated volume discharged and name of receiving waters;
    - 4. Corrective action taken to mitigate or reduce the adverse effects of the spill.
  - c. All reports to the local media must be approved by the Utilities Director, who will forward the report to the Public Information Officer. Only the Public Information Office will release news reports to the media.
  - d. The City must report the same items to the Lowndes County Health
    Department, Environmental Division by telephone. This report is normally
    done by the Environmental Manager, but may be done by any supervisor or by

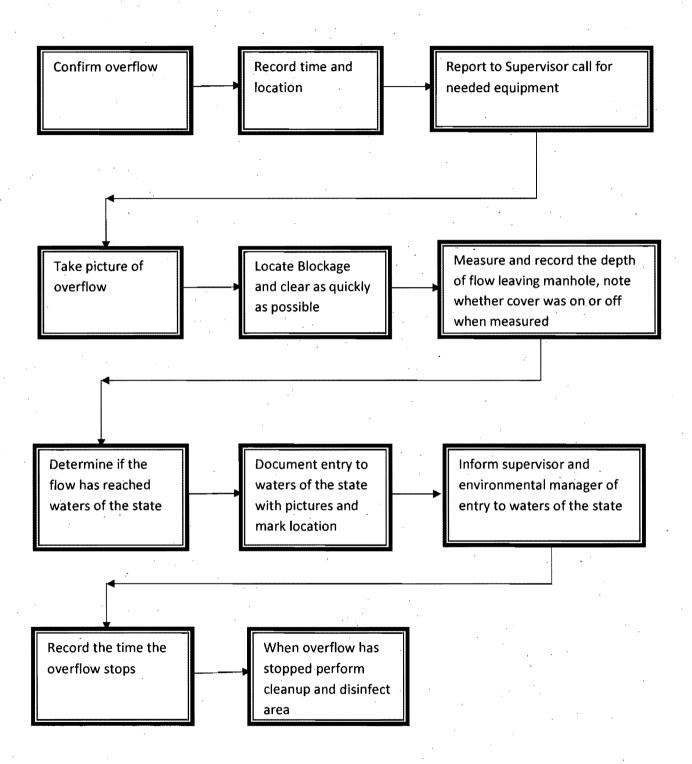
the Environmental Technician. The contact number for Lowndes County Environmental Services is 245-2314.

- e. The City must post notices at the point where sewage entered waters of the state and at public access points downstream. The Environmental Manager has signs for this purpose and will attach copies of the media notice to the signs giving specifics of the spill. The Environmental Manager's staff will be responsible for the placement of the notices.
- f. Within five days of the spill the City must submit a written report to the EPD. The written report must include the items above plus a description of where the spill notices were placed. Normally the draft of this report will be completed by the Environmental Manager and submitted to the Utilities Director for editing and signature. If the Environmental Manager is absent another supervisor will need to complete the first draft of this letter and send an electronic copy to the Utilities Director by e-mail.
- g. The City must publish a notice of the major spill in the Valdosta Daily Times within seven days. The notice must include the items required in the initial report to EPD. Normally the Public Information Officer will arrange the public notice using a copy of the press release.
- h. The City must immediately begin a sampling program for the waterway affected by the major spill. Sample sites are selected upstream and downstream of the major spill site and are monitored for dissolved oxygen, temperature, pH, and fecal coliform. The Environmental Manager's staff will be responsible for selecting sites, collecting samples, and performing on site tests.

# City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date:			·			
Type of Occurrence:						
Date of Spill:		× .				
Time Started or identified:	*				•	
Time Stopped:		·			•	٠
Location:						
Amount:			· ·			
Did spill reach "Waters of the State"?			•			
Receiving water:	•			· ·		
Cause:						
Corrective Action:				•		:
Upstream sampling site will be:						
Downstream sampling site will be:		1				
Reported by:				:		
Contact number:				:		·

### Sanitary Sewer Overflow Response Process



# Attachment F



## CITY OF VALDOSTA, GEORGIA

**Utilities Department** 

Henry Hicks
DIRECTOR OF UTILITIES

May 18, 2011

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Proposal to change local limits

Dear Mr. Noell,

The City of Valdosta has reviewed the effectiveness of local limits designed to protect the publicly owned treatment works, employee safety and health, and Waters of the State. This review is required by the NPDES permits issued to the Withlacoochee River WPCP and the Mud Creek WPCP.

The City finds that most of the current local limits are effective. However, due to severe hydrogen sulfide corrosion in parts of the collection system, hazardous atmospheric conditions in some manholes, and the tightening of permit limits at the Mud Creek facility the City believes it would be beneficial to establish local limits for oxygen demand as COD and for sulfate.

The City of Valdosta requests authorization to establish a local limit of 1700 mg/l for COD and a local limit of 500 mg/l for sulfate as described in the attached report.

Sincerely,

Henry Hicks
Utilities Director



# Proposed Revision to the City of Valdosta Industrial Pretreatment Program And Local Discharge Limits

May 18, 2011

#### I. Background

The Georgia Department of Natural Resources, Environmental Protection Division has re-issued NPDES permits to the City of Valdosta for the operation of the Withlacoochee River WPCP (GA0033235) and the Mud Creek WPCP (GA0020222). Both permits require the City of Valdosta to review the local limits and provide the Environmental Protection Division with a written evaluation of the need revise local limits. Under this requirement the City of Valdosta must review the adequacy of the existing local limits to prevent the discharge of pollutants that, alone or in conjunction with discharges from other sources, will cause interference with the POTW, passthrough of pollutants, or degrade the water quality of the receiving stream. This evaluation involves a review of the performance of the treatment plants, the condition of the sewers, pipes, and other conveyances that deliver wastewater to the treatment plants, the condition of receiving waters, and worker health and safety issues.

The evaluation indicates that most of the local limits are not candidates for modification in that they currently provide sufficient protection for the POTW. However the City of Valdosta is proposing the creation of new local limits for Chemical Oxygen Demand and Sulfate due to severe hydrogen sulfide damage in specific areas of the collection system, the creation of hazardous atmospheric conditions within the POTW, and the lowering of the BOD<sub>5</sub> effluent limit at the Mud Creek WPCP. At present the City has a Chemical Oxygen Demand parameter for the purpose of imposing surcharges, but does not have a maximum limit for COD, and there are no limits concerning sulfate.

#### II. Treatment Plant Performance

#### A. Mud Creek WPCP

The Mud Creek WPCP has generally performed well over the duration of the previous permit. A summary of the past four years results for biochemical oxygen demand, total suspended solids, ammonia nitrogen, and fecal coliform is included and demonstrates a good record of compliance. In 2008 total suspended solids in the effluent increased due to the failure of the existing sand and anthracite media filters. These were replaced with cloth media filters designed for wastewater applications, and the effluent total suspended solids decreased to normal levels. The Mud Creek facility is currently undergoing an expansion to 5.7 MGD through the construction of a second flow train, and the existing flow train is being upgraded. The facility has experienced recurrent problems caused by inflow and infiltration. The City is currently studying the major trunk lines to identify sources and remedies to reduce I&I to the facility.

Currently the Mud Creek facility is permitted to discharge a monthly average BOD<sub>5</sub> concentration of 10mg/l, with a loading limit of 122 kg/day at a flow of 3.22 MGD. Upon completion of the expansion to 5.7 MGD the facility will be required to produce a higher quality effluent with a monthly average BOD<sub>5</sub> limit of 2.9 mg/l (62.7 kg/day at 5.7 MGD). The lowering of allowable oxygen demand discharge from the facility suggests a re-evaluation of the need for local limits on oxygen demand discharge to the facility by industries would be appropriate.

	Mud Cr	eek Efflu	ent BOD <sub>5</sub>	Average
2007	2008	2009	2010	4 year avg.
2.6	2.3	2,1	2.1	2.3
Muc	d Creek Et	fluent BO	D <sub>5</sub> Avera	age Removal %
2007	2008	2009	2010	4 year avg.
98.2	98.6	98.9	99.0	98.7
			<u> </u>	
,	Mud (	Creek Effh	ient TSS A	Average
2007	2008	2009	2010	4 year avg.
10.2	7.9	4.0	4.5	6.6
$\mathbf{M}$	Iud Creek I	Effluent T	SS Averag	e Removal %
2007	2008	2009	2010	4 year avg.
93.6	94.9	97.9	97.1	95.9
		<u></u>		
Mu	d Creek E	ffluent An	monia Nit	rogen Average
2007	2008	2009	2010	4 year avg.
0.2	0.2	0.3	0.6	0.03
×			-	
M	lud Creek I	Effluent Fe	ecal Colifo	rm GeoMean
2007	2008	2009	2010	4 year avg.
13	16	6	. 5	. 9

#### B. Withlacoochee River WPCP

The Withlacoochee River WPCP has also generally performed well over the duration of the previous permit. A summary of the past four years results for biochemical oxygen demand, total suspended solids, ammonia nitrogen, and fecal coliform is included and demonstrates a good record of compliance. The main concerns at the Withlacoochee River facility have been recurrent major spills due to high inflow and infiltration and flooding. The facility is served by a 54" gravity interceptor line that is well within the flood plain of the Withlacoochee River. River flooding contributes greatly to inflow problems at the facility. In April 2009 one third of the facility was

	Pollutant of Interest	Permit limit mg/l	Average Daily Flow MGD	Industrial Contribution (MGD)	Discharge Limit (lbs)	% removal	Maximum Allowable Headworks Load 1 (lbs)
-	BOD <sub>5</sub>	1.0	2.72	0.5	227	98%	11,342
	COD		2.72	0.5	376	98%	18,800
	TSS	30	2.72	0.5	681	98%	34,027

Pollutant of Interest	Safety Factor	Maximum Allowable Headworks Load 2 (lbs)	Non- Industrial Load (mg/l)	Calculated Non- Industrial Load (lbs)	Allowable Industrial Load (lbs)	Uniform Local Limit (mg/l)
BOD <sub>5</sub>	5%	10,775	293	5,425	5,350	1,283
COD	10%	16,920	534	9,887	7,033	1,687
TSS	10%	30,624	251	4,647	25,977	6,230

Using the conditions above the Mud Creek Maximum Allowable Headworks Load for COD is calculated to be 16,920 lbs/day. The non-industrial load is 9,887 lbs/day, leaving 7,033 lbs/day for industrial loads. This equates to a uniform local limit of 1,687 mg/l COD. The City proposes to set the uniform local limit for COD at 1,700 mg/l for concentration based permits and to use this concentration in calculations for mass based permits.

Most of the industries currently under permit are currently meeting this limit or can do so without major capital investment. One industry, Arizona Chemical, will need to make significant improvements to pre-treatment. Arizona Chemical is a resin manufacturer reported under SIC code 2821. The facility is subject to federal pretreatment standards promulgated under 40 CFR 414.111 Subpart K. The industrial pretreatment permit for this facility is mass based. The current permit allows 2,300 pounds per day of COD to be discharged to the POTW. Under the proposed local limit this would be reduced to 500 pounds per day. The City is proposing to present the industry with a compliance schedule of two to three years to allow pretreatment improvements to be studied and implemented. Since Arizona Chemical discharges to the Knights Creek Trunk the application of lower oxygen demanding substances limits would also reduce the available organic material supporting the reduction of sulfate to sulfide.

#### V. Sulfate Limits

Few local control authorities have established local limits for sulfate. However, the excessive corrosion problems and hazardous atmospheres documented along the Knight Creek Trunk indicate that this would be an appropriate step for the City of Valdosta.

<u>Under similar circumstances of high oxygen demand coupled with high sulfate</u>

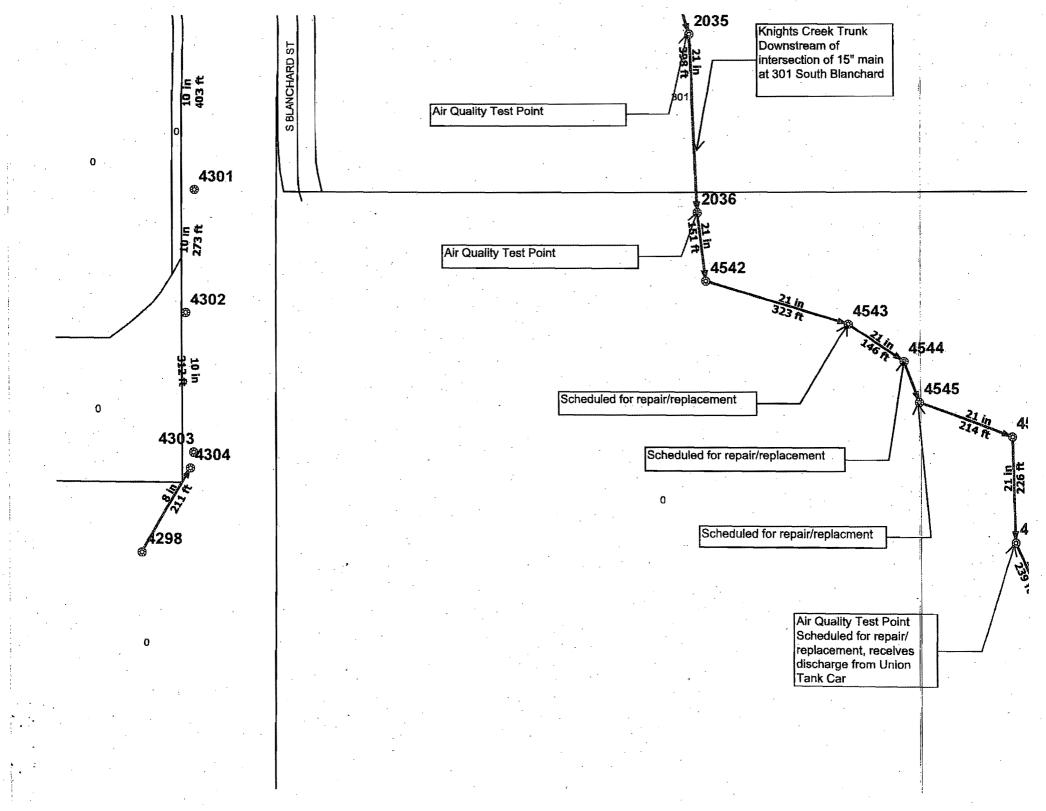
discharges from industries the Massachusetts Water Resources Authority conducted a full scale field trial to identify sulfate discharge limits. The results of this trial are published

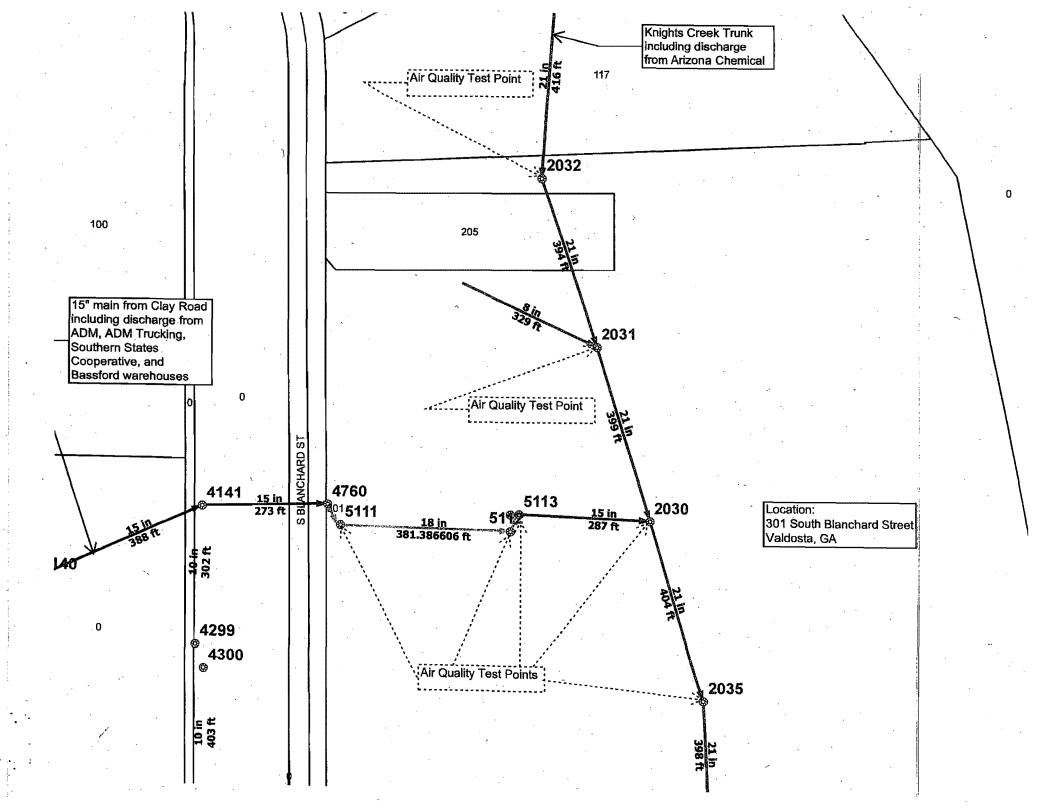
and were presented at WEFTEC 07. The City proposes to use the information included in this study to establish a local limit of 500 mg/l for sulfate in wastewater. This would be applied as necessary to protect the POTW from excessive corrosion and reduce the occurrence of hazardous atmospheric conditions. At the present time one industry would be affected, Archer Daniel Midland (ADM). The current permit for ADM expires June 30, 2013. Upon acceptance of these changes by the Approval Authority the City will contact ADM to advise them of upcoming sulfate limits on the 2013 permit. This will allow two years for the company to study the problem and make plans for any necessary pretreatment upgrades.

## Appendix A

Manhole Air Quality Testing

Knights Creek Trunk Line





		Manhole 2036							
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %				
11/10/10		,							
11/15/10	14:51	20	18	10	28				
11/16/10	14:53	12	18.8	10	25				
11/17/10	15:02	20	18.9	13	9				
11/18/10	15:49	12	18.5	35	26				
11/19/10	16:07	27	17.3	10	32				
11/22/10	14:59	6	18.7	11	25				
11/23/10	15:18	38	20	17	27				
11/24/10		4	18.5	1.7	25				
11/26/10	14:24	13	18.5	18	23				
11/29/10		35	18.6	25	15				
11/30/10		35	19.2	23	12				
12/1/10	16:04	15	20.1	0	6				
12/2/10	10:15	62	16.8	16	33				
12/3/10.	11:32	1	19.4	0	15				
12/6/10									
12/7/10	16:27	10	20.1	0	0				
12/9/10		3	20.9	0	0				
12/10/10	14:49	25	19.4	16	10				
12/14/10		4	20	0.	0				

Over 10 ppm H2S	67%		
Over 10% LEL			67%

		Mar	Manhole 2035					
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %			
11/10/10		·			·			
11/15/10	14:44	43	18.7	15	18			
11/16/10	14:44	15	19.4	20	19			
11/17/10	14:59	38	18.9	9	9			
11/18/10	15:53	43	18.5	54	52			
11/19/10	16:05	71	17.7	16	22			
11/22/10	14:56	3	19	8	. 16			
11/23/10	15:07	133	19	26	14			
11/24/10		28	15.4	90	82			
11/26/10	14:30	. 29 .	18.9	29	18			
11/29/10		92	19.1	42	11			
11/30/10		14	19.5	30	9			
12/1/10	15:56	4 .	19.7	0	. 8			
12/2/10	10:22	108	18	. 31	21			
12/3/10	11:39	0	17	8	37			
12/6/10								
12/7/10	16:25	. 17	19.6	11	6			
12/9/10		. 17	18	16	13			
12/10/10	14:56	25	19.7	17	8			
12/14/10		6 /	19.8	0	0			
,		·						

Over 10 ppm H2S	78%	·	
Over 10% LEL			67%

	Manhole 2030					
,	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %	
11/10/10				·		
11/15/10	14:37	>200	19.7	32	12	
11/16/10	14:51	>200	17.5	54	- 39	
11/17/10	14:57	187	19.5	20	8	
11/18/10	15:57	>200	19	74	13	
11/19/10	16:00	>200	19.3	-30-	5	
11/22/10	14:52	.75	19.1	27	16	
11/23/10	14:56	>200	20	37 -	6	
11/24/10		>200	18	153	50	
11/26/10	14:34	66	20.3	22	4	
11/29/10		104	20.3	26	4	
11/30/10		111	20.9	24	3 .	
12/1/10	15:59	112	20.9	. 19	0	
12/2/10	10:28	>200	19.2	120	1.0	
12/3/10	11:41	163	19.6	35	17	
12/6/10						
12/7/10	16:23	96	20.9	27	3	
12/9/10		200	: 18.5	121	31	
12/10/10	15:17	70	20.3	26	4	
12/14/10	·	43	20.9	9	0.	

Over 10 ppm H2S	100%	·	
Over 10% LEL			39%

Date		Manhole 4547						
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %			
11/10/10			:					
11/15/10	15:22	>200	20	11	7			
11/16/10	15:45	21	17.1	11.	45			
11/17/10	15:30	>200	19.8	12	47			
11/18/10	15:30	>200	20.9	53	8			
11/19/10	15:45	>200	20.3	19	13			
11/22/10	15:40	. 45	20.9	8	3			
11/23/10	15:49	158	20.9	37	0			
11/24/10		140	20.9	19	. 0 -			
11/26/10	14:12	>200	20.2	32	· 4			
11/29/10	·	106	20.9	13	0			
11/30/10	15:10	124	20.9	14	0 .			
12/1/10	16:44	>200	19.8	. 83	6			
12/2/10	·	>200	18.4	530	25			
12/3/10	11:12	>200	19.4	149	. 9			
12/6/10	13:54	>200	19.7	162	23			
12/7/10	16:00	>200	19.5	148	9			
12/9/10	15:25	>200	18.2	241	19			
12/10/10	14:25	>200	19.9	100	5			
12/14/10		164	18.2	67	8			
,	-							
,					-			
	Over 10 ppm H2S	100%						
	Over 10% LEL		·		32%			

Date	Manhole 4546						
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %		
11/10/10	15:30	140	12.8	28 .	>100		
11/15/10	15:13	6	18	6	23		
11/16/10	15:39	>200	20.2	63	6		
11/17/10	15:45	_20	17.6	10	27		
11/18/10	15:35	10	17.2	31	39		
11/19/10	15:40	0	20.3	0	. 7		
11/22/10	15:30	4	17.2	4	35		
11/23/10	15:59	6	17.8	7	18		
11/24/10		6	14	20	80		
11/26/10	14:16	2	14.9	7	56		
11/29/10		1	16.5	5	42		
11/30/10	·	0	15.9	5	38		
12/1/10	15:22	10	19	5	10		
12/2/10							
12/3/10	11:18	4	19.6	0	11		
.12/6/10	13:56	0	18.3	5 .	20		
12/7/10	16:06	138	19.7	35	9		
12/9/10		185	18.7	45	17		
12/10/10	14:37	117	18	34	21		
12/14/10		26	19.9	10	3 ·		
			-				
	Over 10 ppm H2S	37%		· · ·			
	Over 10% LEL				74%		

		Manhole 2031						
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %			
11/10/10	·		·					
11/15/10	14:33	70	20.9	0	. 3			
11/16/10	14:38	50	20.5	5	7			
11/17/10	14:51	51	19.8	9	9			
11/18/10	15:59	32	18.8	79	20			
11/19/10	15:55	14	20	0	0			
11/22/10	14:48	1	19	0	6			
11/23/10	14:50	26	20	11	4			
11/24/10		27	16.8	9	37			
11/26/10	14:36	37	20.1	22	. 6			
11/29/10		25	19	19	11			
11/30/10		66	20.3	23	3			
12/1/10	15:46	6	20.9	0	0 .			
12/2/10	10:32	54	20.1	16	5			
12/3/10	11:44	2	20	0 .	5			
12/6/10			··					
12/7/10	16:21	0	20.9	0	0			
12/9/10	15:56	3 ·	20.1	0	0			
12/10/10	16:05	2	20.9	0	0			
12/14/10	•	1	20.9	. 0	0			

Over 10 ppm H2S	61%		·
 Over 10% LEL		٠	17%

	Manhole 2032					
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %	
11/10/10						
11/15/10	14:18	5	20.9	0	0	
11/16/10	15:15	0	19.9	0	. 0	
11/17/10	14:48	40	19.6	· 7	7	
11/18/10	16:04	71	19.2	31	16	
11/19/10	15:50	47	20.3	18	12	
11/22/10	14:44	12	18.8	18	9	
11/23/10	14:38	21	20.3	4	0	
11/24/10		82	18.6	62	23	
11/26/10	14:44	0	20.9	0	0	
11/29/10		55_	19.8	23	6 .	
11/30/10		0	20.9	0	0	
12/1/10	15:30	181	18.2	0	0	
12/2/10	10:36	138	20	40	5	
12/3/10	11:47	66	20.9	13	3	
12/6/10	,					
12/7/10	16:20	82	20.9	20	6	
12/9/10	15:51	67	20.3	15	0	
12/10/10	16:13	30	19.7	19	5	
12/14/10		36	20.9	10	3	
		•				

Over 10 ppm H2S	78%		
Over 10% LEL	,		17%

	Manhole 5113				
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %
11/10/10	15:47	41	16.3	53	50
11/15/10	14:55	92	18.6	21	24
11/16/10	15:18	22	18.8	10	25
11/17/10	15:10	9	. 18	16	35
11/18/10	15:40	140	17.6	34	55
11/19/10	16:10	65	17	25	63
11/22/10	15:05	69	19.2	10	27
11/23/10	15:28	200	18,8	123	27
11/24/10		>200	17.8	154	50
11/26/10	14:52	0	20.9	0	0
11/29/10		22	20	9	9
11/30/10		39	20.9	- 10	3
12/1/10	16:08	76	26.9	176	6
12/2/10	10:39	85	19.5	24	13
12/3/10	11:51	78	19.4	20	20
12/6/10					
12/7/10	16:30	22	20.2	6	3
12/9/10	16:23	>200	18.6	201	36
12/10/10	16:19	>200	20.9	109	6
12/14/10		0	20.9	0	0

-	Over 10 ppm H2S	84%	·	,
	Over 10% LEL		·	63%

	-	Manhole 5112				
	Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %	
11/10/10	15:43	50	16	26	71	
11/15/10	14:59	80	18.7	20	22	
11/16/10	. ,15:16	33	19.6	. 5	21	
11/17/10	15:13	8	18.3	20	64	
11/18/10	15:47	49	17.9	31	36	
11/19/10	16:15	84	17.1	: 30	64	
11/22/10	15:10	121	19.3	15	23	
11/23/10	15:26	200	18.8	37	21	
.11/24/10		>200	17.4	168	50	
11/26/10	14:54	5	20.9	0	0	
11/29/10		45	19.5	16	16	
11/30/10		58	20.3	16	7	
:12/1/10	16:13	67	20.2	131	6	
12/2/10	10:41	131 .	19.7	35	12	
12/3/10	11:52	90	19.6	22	1.7	
12/6/10						
12/7/10	16:32	18	20	17	. 8	
12/9/10	16:25	>200	18.8	204	- 29	
12/10/10	16:23	>200	20.2	140	6 .	
12/14/10		0	20.9	0	0	

Over 10 ppm H2S	84%		
Over 10% LEL		,	68%

Manhole 5111

700000000000000000000000000000000000000		Mannole 3111				
		Time	H <sub>2</sub> S ppm	O <sub>2</sub> %	CO ppm	LEL %
.11/	10/10	15:51	>200	16.1	40	77
11/	15/10	15:02	>200	18.6	36	31
11/1	16/10	15:22	66	18.9	17	. 39 .
11/1	17/10	15:16	22	19.8	12	39
11/1	8/10	15:43	111	17.5	. 31	40
11/1	9/10	16:18	>200	203	. 19	13
11/2	22/10	15:20	146	19.8	17	15
11/2	23/10	15:22	200	18	37	0
11/2	4/10		200	18.9	87	24
11/2	6/10	14:59	56	20	21	8
11/2	9/10		>200	18.6	36	50
11/3	0/10		187	20.1	29	6
12/1	1/10	16:21	198	20.1	37	10
12/2	2/10	10:44	. >200	19.8	60	14
12/3	3/10	11:54	64	20.9	14	7
12/6	6/10	· .	·			
12/7	7/10	16:35	78	19.8	24	10
12/9	0/10	16:29	>200	19.7	157	31
12/10	0/10	16:30	>200	20.2	240	7
12/14	4/10		. 0	20.9	0	0

Over 10 ppm H2S	95%		
Over 10% LEL		,	58%

## Georgia Department of Natural Resources

Environmental Protection Division, Watershed Protection Branch 4220 International Parkway, Suite 101, Atlanta, Georgia 30354 Wastewater Regulatory Program

> 404/362-2680 FAX: 404/362-2691

February 15, 2012

Mr. Henry Hicks Director of Utilities City of Valdosta P.O. Box 1125 Valdosta, Georgia 31603

RE:

Industrial Pretreatment Program

Local Limits Evaluation

City of Valdosta

Dear Mr. Hicks:

The Environmental Protection Division (EPD) has made a tentative determination that the local limits evaluation for the above mentioned industrial pretreatment program complies with the requirements of 40 CFR Part 403, as amended, and should be approved.

Industrial pretreatment regulations require public notification of the local limit evaluations in order to provide an opportunity for written public comment and public hearing prior to EPD's final determination to approve the evaluations. The attached public notice should be published at least one time by the City in the largest daily newspaper in the area. The cost of publishing the public notice is the responsibility of the City. A copy of the published notice should be submitted to this office within 10 days of the publication date.

After reviewing any comments received at the conclusion of the forty-five day public notice period, a second notice of EPD's final determination will be required. This notice, which requires no public comment period, will be sent to the City for publication at the appropriate time.

Sincerely.

Bill Noell, Manager

Industrial Permitting Unit

BN/awl

#### **PUBLIC NOTICE**

Department of Natural Resources Environmental Protection Division 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

Notice of Application for Approval of Local Limits Evaluation for the City of Valdosta Industrial Pretreatment Program.

The following applicant has applied for approval of a substantial modification to its industrial pretreatment program:

City of Valdosta, 1016 Myrtle Street, Valdosta, Georgia 31603, for substantial modification to its industrial pretreatment program. This modification will serve to revise the local limits of the City of Valdosta industrial pretreatment program.

On the basis of preliminary staff review and the application of the Industrial Pretreatment Regulations, EPD proposes to approve the City's substantial modification to its industrial pretreatment program. This proposed determination is tentative.

Persons wishing to comment upon the proposed determination are invited to submit EPD address above. writing the or EPDcomments@dnr.state.ga.us, no later than 45 days after this notification. If you choose to e-mail your comments, please be sure to include the words "City of Valdostasubstantial modification/industrial pretreatment program" in the subject line to ensure that your comments will be forwarded to the correct staff. All comments received prior to or on that date will be considered in the formulation of final determinations regarding the program modification. A public hearing may be held where the EPD Director finds a significant degree of public interest in a proposed determination. Additional information regarding public hearing procedures is available by writing the Environmental Protection Division.

The proposed substantial modification submittal and comments received are available for review and copying at 4220 International Parkway, Suite 101, Atlanta, Georgia between the hours of 9:00 a.m. and 4:00 p.m., Monday through Friday.

Please bring the foregoing to the attention of persons who you know will be interested in this matter.



## CITY OF VALDOSTA, GEORGIA Utilities Department

Henry Hicks
DIRECTOR OF UTILITIES

March 6, 2012

Mr. Bill Noell, Manager Industrial Permitting Unit GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Industrial Pretreatment Program Local Limits Evaluation City of Valdosta

Dear Mr. Noell:

The City of Valdosta has published the Notice of Application for Approval of Local Limits Evaluation for the City of Valdosta Industrial Pretreatment Program as required. The date of publication was Friday, March 2, 2012. Enclosed is a copy of the publication.

Respectfully,

Henry Hicks Utilities Director



#### PUBLIC NOTICE

Department of Natural Resources Environmental Protection Division 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

Notice of Application for Approval of Local Limits Evaluation for the City of Valdosta Industrial Pretreatment Program.

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On the basis of preliminary staff review and the application of the Industrial Pretreatment Regulations, EPD proposes to approve the City's substantial modification to its industrial pretreatment program. This proposed determination is tentative.

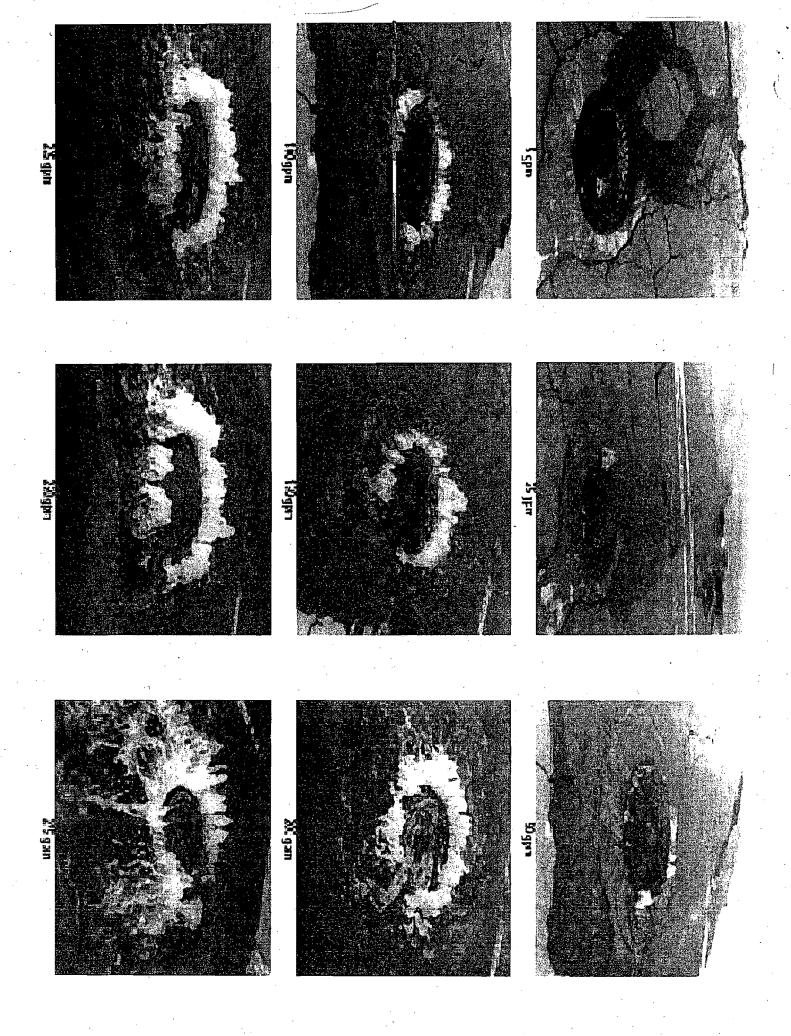
Persons wishing to comment upon the proposed determination are invited to submit same in writing to the EPD address above, or via e-mail at <a href="mailto:EPDcomments@dnr.state.ga.us">EPDcomments@dnr.state.ga.us</a>, no later than 45 days after this notification. If you choose to e-mail your comments, please be sure to include the words "City of Valdosta-substantial modification/industrial pretreatment program" in the subject line to ensure that your comments will be forwarded to the correct staff. All comments received prior to or on that date will be considered in the formulation of final determinations regarding the program modification. A public hearing may be held where the EPD Director finds a significant degree of public interest in a proposed determination. Addition information regarding public hearing procedures is available by writing the Environmental Protection Division.

The proposed substantial modification submittal and comments received are available for review and copying at 4220 International Parkway, Suite 101, Atlanta, Georgia between the hours of 9:00 a.m. and 4:00 p.m., Monday through Friday.

Please bring the foregoing to the attention of persons who you know will be interested in this matter.

## Methods of Estimation

- Comparison of pictures of known flow
- Measurement of downstream flow before and after blockage is cleared using depth, pipe size, and velocity
- Measurement of flow leaving spill site by measurement of area and velocity
- Estimation using container of known volume and stop watch
- The best method to use depends on the conditions at the spill site



#### Valdosta Utilities Department Activities Related to Sewer System Issues

The City of Valdosta Utilities Department has aggressively moved forward on implementation of our sewer system rehabilitation master plan and well as pursuing a formal response from FEMA Region IV on the relocation the Withlachoochee WPCP to higher ground. It is extremely important to note that FEMA has stated that any issuance of a consent order to the City of Valdosta prior to resolution of the city claim would make the city ineligible for any FEMA funding. Both EPD and EPA are aware of this and have previously agreed to not consider any consent order until the FEMA claim is fully resolved.

#### Withlachoochee WPCP

City has submitted detailed Improved Project Document to FEMA justifying the relocation of the Withlachoochee WPCP to a higher location. Documentation submitted fully meets all FEMA requirements warranting this relocation, including BCA (benefit cost analyses) and prevailing laws. FEMA has yet to respond in any way and has exceeded its own 90-day response period. The city has submitted a letter to it Congressional Delegation in Washington DC at their staffs request to be submitted by the Congressional Delegation to FEMA Headquarters in order to get a formal response from Region IV. Without a response from Region IV, the city cannot move forward on its final appeal to FEMA Headquarters. The city has the full support of its Washington Congressional Delegation to get this project approved and fully funded.

In the interim, the City has purchased 70 acres of land approximately 54-feet higher than the existing facility. In addition, the Utilities Department has contracted with Parsons Group for the design of a new force main two pump stations, an equalization basin and new headworks structure with bar screens and grit removal system for construction on this site. The 30% design has been completed and a DDR and EID will be submitted to EPD for review and approval towards the end of July on this project. Once the DDR and EID are approved the Utility Department will move forward on 100% design, specifications and bid documents. The city has also contracted with a local property appraiser to start work on acquiring necessary easements for the force main and pump stations. This project is an interim measure until the full pant can be relocated. This project will allow for the abandonment of the 54-inch gravity main to the Withlachoochee WPCP that runs alongside the Withlachoochee River and is constantly prone to significant inflow during high river levels as well as ongoing infiltration of surface and ground water at normal times. In addition, the force main project will also allow for the abandonment of three large interceptors entering the 54-inch gravity main. This project will also allow for abandonment of the current influent pump station which is over 30-years old, under constant state of repair and prone to flooding as well. The total cost of this project is expected to be around 30 million dollars.

Over the past year, approximately \$800,000 has been expended at the Withlachoochee WPCP on equipment replacement and other improvements to keep the facility fully functional and meeting permit requirements until relocation can be accomplished. The wetwell at the influent pump station was cleaned this year, old equipment removed and bypass pumping capabilities installed for this building for emergency purposes.

#### **Mud Creek WPCP**

Expansion of the wet treatment portions of this facility has been completed and started. Biosolids treatment portion and new Outfall are under construction with completion expected in February of 2012. The total cost of this project is expected to be about 40 million dollars and also include rehabilitation of the majority of the facilities in the old portion of the plant.

Cleaning and CCTV evaluation of the Mud Creek Interceptor has been completed and minor repairs associated with this evaluation will be undertaken upon completion of the cleaning and CCTV evaluation of the Knights Creek Interceptor later this summer.

#### **Sewer Collection System**

Last year a FOG Prevention Ordinance was adopted and submitted to EPD. This program has significantly reduce SSO's associated with fats, oils or grease blockages.

The Utility Department has contracted for the replacement of four lift station (Ponderosa, Big Country Club, Eastwind and Mack Drive) this year. Construction will begin once control panels are delivered and be completed within 180 days of delivery. As part of this work implementation of SCADA will take place for all lift stations. Funding is being sought to complete the replacement of ten remaining lift stations.

The Department has also contracted for the replacement or rehabilitation of 20 serious deteriorated manholes located in problem areas. This contract will be the first phase of multiple annual contracts for manhole rehabilitation funded at approximately 1.0 million dollars per year.

We anticipate adoption of a Standards and Specifications with Details Document later this year. This document will be the standard for all future water and sewer infrastructure construction.

A (CMMS) Computerized Maintenance Management Software system is in the process of being implemented for all water and sewer divisions and operations. To date the Water Plant, Withlachoochee and Lift Station facilities have been completed. Mud Creek Plant is next followed by Warehouse, then Distribution and Collection system, followed with Meter Read division, Industrial Compliane and FOG programs.

A consultant will be selected later this summer to perform a complete and comprehensive water and sewer rate study and make recommendations to ensure that both short and long term rehabilitation and capital plans are fully funded.

#### Summary

Over the last two years and within next three years the City of Valdosta has or is in the process of completing over \$104,000,000 in sewer system related projects. This total does not include funding for the relocation of the Withlachoochee WPCP or additional I&I work planned for subsequent years. This total also does not include significant capital funds being

expended by the Utilities Department with regards to its water treatment and distribution systems.

Again, I must reiterate that FEMA has stated that any issuance of a consent order to the City of Valdosta before the claim is resolved would make the city ineligible for any FEMA funding. Both EPD and EPA are fully aware of this and have previously agreed to not consider any consent order until the FEMA claim is fully resolved.



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 2 3 2012

#### <u>CER TIFIED MAIL</u> 7012 1010 0001 8097 0689 RETURN RECEIPT REQUESTED

City of Valdosta
Attn: Mr. Larry H. Hanson
City Manager
216 East Central Avenue
P.O. Box 1125
Valdosta, Georgia 31603-1125

Re: Information Request – Section 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit Nos. GA0033235 and GA0020222
Withlacoochee River Wastewater Treatment Plant and Mud Creek Wastewater Treatment Plant

Dear Mr. Hanson:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency, Region 4 hereby requests the City of Valdosta (the City) to provide the information set forth in Enclosure A regarding the wastewater treatment plants noted above and their associated sanitary sewer collection systems. The City is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Mr. David Phillips, Enforcement Officer U.S. Environmental Protection Agency, Region 4 Clean Water Enforcement Branch 61 Forsyth Street, S.W. Atlanta, Georgia 30303-8960

The City's response to this information request should specifically reference the particular section and number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible City of Valdosta official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic) which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place, as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch at the U.S. EPA, Region 4.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

Also enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet*, which may assist you in understanding the compliance assistance resources and tools available. However, any decision to seek compliance assistance at this time does not relieve the City of its obligations to the EPA or the State of Georgia, does not create any new rights or defenses, and will not affect the EPA's decision to pursue enforcement action.

Please feel free to contact Mr. David Phillips, Enforcement Officer at (404) 562-9773 or by email at phillips.david@epa.gov, if you have questions regarding this notice and information request.

Sincerely,

Denisse D. Diaz, Chief

Clean Water Enforcement Branch

Water Protection Division

Enclosures

cc: Ms. Jane Hendricks
Georgia Environmental Protection Division

Mr. Sheldon Irvin Valdosta, Georgia

#### **ENCLOSURE A**

#### SSO PROGRAM City of Valdosta, GA

#### 1. Provide the following:

- a. The size of the City of Valdosta's Sanitary Sewer Collection System (SSS) (linear feet or miles);
- b. A list of the pump stations in the SSS, including size (gpm), and indicate if back up power is available and if it is adequate to fully operate the pump station;
- A list of all constructed overflow points (any unpermitted constructed discharge points)
  in the SSS (including pump stations) prior to the headworks of the City of Valdosta's
  WWTPs;
- d. The average design flow of the City of Valdosta's WWTPs;
- e. The peak design flow of the City of Valdosta's WWTPs;
- f. The annual average flow of the City of Valdosta's WWTPs; and
- g. The population served by the City of Valdosta's WWTPs and their respective SSSs.
- 2. For purposes of this Information Request, a sanitary sewer overflow (SSO) is an overflow, spill, release, or diversion of wastewater from the SSS. SSOs include overflows or releases of wastewater that reach waters of the United States (U.S.); overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO.

Provide a listing of all SSOs that occurred from September 2007 to the present. For each SSO provide the following:

- a. Date(s) of the SSO;
- b. Time (and Date if other than a. above) when the City of Valdosta was notified that the SSO event occurred;
- c. Time (and Date if other than a. above) when the City of Valdosta (or contractor) crew responded to the SSO;
- d. Time (and Date if other than a. above) when the SSO ceased;
- e. Time (and Date if other than a. above) when corrective action was completed;
- f. Location of the SSO, including source (pump station, manhole, etc.);
- g. Ultimate destination of the SSO, such as surface waterbody (by name, if available), storm drain leading to surface waterbody (by name, if available), dry land, building, etc.;
- h. Volume of the SSO;
- i. Cause of the SSO such as grease, roots, other blockages, wet weather (infiltration and inflow), loss of power at pump station, pump failure, etc.;
- j. Corrective actions taken to stop the SSO; and
- k. Corrective actions taken to prevent this or similar SSOs in the future.

If available, please provide the above information in a Microsoft compatible spreadsheet format.

3. If the City of Valdosta has a formal written plan for responding to, addressing, and reporting

SSOs (i.e., a Sewer Overflow Response Plan ("SORP")), provide a copy of the plan.

- 4. Provide a copy of any additional City of Valdosta procedures not included in the SORP (as referenced in Question 3 above) for the following activities:
  - a. Documenting SSOs;
  - b. Estimating SSO volume;
  - c. Identifying root causes of SSOs;
  - d. Containment and clean-up of SSOs, including any specific procedures addressing backups into buildings caused by mainline problems;
  - e. Identifying wet weather related SSOs and reconnaissance of these during rain events; and
  - f. All reporting of SSOs to the permitting authority, the State of Georgia.
- 5. Provide the name of the person (or position title) responsible for each of the activities indentified in the City of Valdosta's SORP and/or listed in Question 4 above.

#### **ENCLOSURE B**

## RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS (40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). Method and time of asserting business confidentiality claim. A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.



## U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources, including workshops, training sessions, hotlines, websites and guides, to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

#### **EPA's Small Business Websites**

Small Business Environmental Homepage - www.smallbiz-enviroweb.org Small Business Gateway - www.epa.gov/smallbusiness

EPA's Small Business Ombudsman - www.epa.gov/sbo or 1-800-368-5888

## EPA's Compliance Assistance Homepage

www.epa.gov/compliance/assistance/business.html

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

### **EPA's Compliance Assistance Centers**

www.assistancecenters.net

EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

#### Agriculture

www.epa.gov/agriculture/

### **Automotive Recycling**

www.ecarcenter.org

#### Automotive Service and Repair www.ccar-greenlink.org or 1-888-GRN-LINK

## Chemical Manufacturing www.chemalliance.org

#### Construction

www.cicacenter.org or 1-734-995-4911

#### Education

www.campuserc.org

#### **Food Processing**

www.fpeac.org

#### Healthcare

www.hercenter.org

#### **Local Government**

www.lgean.org

#### Metal Finishing

www.nmfrc.org

#### **Paints and Coatings**

www.paintcenter.org

### **Printed Wiring Board Manufacturing**

www.pwbrc.org

#### **Printing**

www.pneac.org

#### Ports

www.portcompliance.org

## U.S. Border Compliance and Import/Export Issues

www.bordercenter.org

## Hotlines, Helplines and Clearinghouses

www.epa.gov/epahome/hotline.htm

# EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

#### **Antimicrobial Information Hotline**

info-antimicrobial@epa.gov or 1-703-308-6411

## Clean Air Technology Center (CATC) Info-line

www.epa.gov/ttn/catc or 1-919-541-0800

#### **Emergency Planning and Community Right-To-Know Act**

www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346

## **EPA Imported Vehicles and Engines Public Helpline**

www.epa.gov/otaq/imports or 734-214-4100

#### National Pesticide Information Center www.npic.orst.edu/ or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills www.nrc.uscg.mil or 1-800-424-8802

## Pollution Prevention Information Clearinghouse (PPIC)

www.epa.gov/opptintr/ppic or 1-202-566-0799

#### Safe Drinking Water Hotline

www.epa.gov/safewater/hotline/index. html or 1-800-426-4791

### Stratospheric Ozone Protection Hotline

www.epa.gov/ozone or 1-800-296-1996

### U. S. EPA Small Business Resources

### Toxic Substances Control Act (TSCA) Hotline

tsca-hotline@epa.gov or 1-202-554-1404

#### **Wetlands Information Helpline**

www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828

#### State and Tribal Web-Based Resources

#### **State Resource Locators**

www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

## State Small Business Environmental Assistance Programs (SBEAPs)

www.smallbiz-enviroweb.org

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits. The website is a central point for sharing resources between EPA and states.

### **EPA's Tribal Compliance Assistance Center**

www.epa.gov/tribalcompliance/index.html

The Center provides material to Tribes on environmental stewardship and regulations that might apply to tribal government operations.

#### **EPA's Tribal Portal**

www.epa.gov/tribalportal/

The Portal helps users locate tribal-related information within EPA and other federal agencies.

#### **EPA Compliance Incentives**

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

#### **EPA's Small Business Compliance Policy**

www.epa.gov/compliance/incentives/smallbusiness/index.html

This Policy offers small businesses special incentives to come into compliance voluntarily.

#### **EPA's Audit Policy**

www.epa.gov/compliance/incentives/auditing/auditpolicy.html

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

## Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or go to their website at www. sba.gov/ombudsman.

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

#### Your Duty to Comply

If you receive compliance a istance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions. Memorandum

To: Henry Hicks

From: John Waite

Flooding issues prior to 2009

Sir:

You asked me to look into past records for times when Ponderosa Pump Station, Big Country Club Station, and Withlacoochee Treatment Plant were unable to operate properly due to flooding, including spills and cleanup actions. I have found the following information.

Ponderosa and Big Country Club stations:

Feretz helped me look into these records. The two stations have had problems with overloading due to I&I, but neither was put out of service by flooding until the 2009 flood.

Withlacoochee Treatment Plant:

March 1984: Flood water from the Withlacoochee River reached the influent pump station on March 7<sup>th</sup>. The operators monitored the water level throughout the 7<sup>th</sup> and 8<sup>th</sup>. On March 9<sup>th</sup> the water reached the top of the concrete pad at the pump station. The Withlacoochee crew along with other city crews sandbagged and began hauling dirt. City dump trucks hauled dirt and Reames Construction supplied a bulldozer to build the original dam.

Electrical power was turned off to the Chorine Building for one day. For that day effluent sampling, flow measurement, and chlorination were not possible, and no re-use water would have been available. No records of payments to outside vendors are available at the plant for this event.

<u>February 1986</u>: Flood water from the Withlacoochee River again reached the plant and threatened to breach the dam. Work to improve and raise the dam began at 2:30 am on the 11<sup>th</sup> and continued until February 14<sup>th</sup>. City crews from utilities and engineering worked on the project, along with contractor crews from Standard Contractors and Reames and Sons.

Electrical power was turned off to the Chlorine Building for six days, from the evening of the 11<sup>th</sup> until the afternoon of the 17<sup>th</sup>. There was no chlorination of the effluent for those six days, and no re-use water available.

The following payment records are on file at Withlacoochee from this event.

Gold Plate Restaurant	Dinners for crews (61)	\$244.00
Rawsons	Miscellaneous food supplies	\$28.99
Reames and Sons	Equipment rental	\$3350.00
J.W. Meadors, Inc.	Labor and equipment	\$1830.00
Standard Contractors	Dump truck rental	\$560.00

<u>January 1991</u>: Rising flood waters reached the dam and the stormwater drain had to be closed. Pumps were borrowed to allow rain water that collected around the influent station to be pumped out of the plant. Rolls of plastic sheeting were purchased to protect the back side of the dam from erosion. There is no mention in the daily log of the power to the Chlorine Building being turned off during this event. Four loads of clay were brought in to block the road to the influent station in case the river water came around the end of the dam.

The following payment records are on file at Withlacoochee from this event.

Lowndes County Support Service	Clay delivery	\$166.40	
Miller Hardware	plastic	\$259.20	
Miller Hardware	plastic	\$97.20	
Patria Packaging	sandbags	\$130.00	

These are the records of service disruption and associated costs due to river flooding that I have been able to locate. The Withlacoochee plant has also suffered permit violations in the form of Major Spills as defined in the NPDES permit due to flood influence on the Withlacoochee Interceptor line.

Each major spill requires upstream and downstream water quality monitoring according to a set schedule for a period of one year. Each site is sampled eighteen times over the year following the major spill. Each sampling event requires one sampler for a period of two hours, one laboratory technician for one hour, and \$17.84 in laboratory supplies.

Sampler	Two hours	\$24.44	
Laboratory Staff	One hour	\$29.65	
Laboratory Supplies	Total	\$17.84	
Total per sample		\$71.93	,
Total per Spill (18 samples)		\$1,294.74	

#### Flood Water Influence on Plant Flow

Prior to 1995 I had observed that when the river level reached flood stage of 13' on the McMillian Road gauge we would begin to receive river water in the influent of the Withlacoochee plant. After the interceptor manhole rehabilitation project was carried out in the mid 90's it appeared that the river did not begin to enter until the river reached 16'. In an effort to demonstrate a relationship between river level and infiltration rate at the plant I began to keep records of daily flow, seven day average flow, daily rainfall, river level, and estimated inflow

and infiltration. I broke the information down into rain events or extended periods of rain based on the infiltration rate. I would begin with a rain event and carry the record until the infiltration dropped below 1 MGD. I kept these records between 2000 and 2006.

In forming a rain event record I began with a single rain event. I calculated the seven day average flow prior to the rain event and used it as the base flow. I then monitored daily flow and assumed the rise above the base flow to be I&I. I would carry the record until the I&I had dropped below 1 MGD for a couple of days, which I took to be a return to normal base flow. If more rain occurred before a return to normal flow I would continue the record as an extended period of rain and infiltration. This allowed me to see differences in infiltration as the river level rose and the ground became more saturated.

I have taken the flow/rain records and divided them into three categories based on river level. For each record I have calculated the average rate of inflow and infiltration, and the maximum river level. The results are divided into I&I rates with the river below 7', from 7' to 14', and finally with the river level above 14'.

Division (River Gauge Level)	Average Rate of I&I per Inch of Rain	Maximum River Level
<7 Feet	2.1 MG/inch	5.95 feet
7-14 Feet	4.8 MG/inch	13.54 feet
>14 Feet	7.7 MG/inch	19.61 feet

Between April 2000 and July 2006 there were four major spills caused by flooding of the Withlacoochee River and Sugar Creek over the Withlacoochee interceptor line and the Sugar Creek Outfall Extension line. Here is a brief description of each.

On September 13, 2000 a major spill from a manhole beside Sugar Creek just upstream of the beginning of the Withlacoochee Interceptor was discovered. The Withlacoochee River had peaked at 16.82' on September 9<sup>th</sup>, and the manholes along Sugar Creek just upstream of the Withlacoochee Interceptor had been underwater. The average estimated infiltration for the period of September 5, 2000 to October 5, 2000 was 3.1 MGD. However, on the two days the river was above 16' the infiltration rate was over 8 MGD. On September 9, 10, and 11, 2000 the Withlacoochee plant influent sample contained low solids levels in keeping with the high infiltration rate and direct river influence.

On March 7, 2003 the Withlacoochee WPCP suffered a major spill caused by hydraulic overload of the secondary system during another flood event. During the period from February 16, 2003 to April 30, 2003 the area received 20.85" of rain. The average I&I per inch of rain at Withlacoochee was 14.2 MG/inch. The average I&I per day was 4 MGD. During the peak flooding the infiltration rate averaged 13.3 MGD, again indicating direct river influence. The infiltration rate for the day of the major spill, March 7<sup>th</sup>, was 15.6 MG. On March 11<sup>th</sup> the operator's comments included a report of clay colored influent which was most likely river water.

Another major spill was recorded on June 20° 2003 after 14" of rain over 18 days brought the river level to 15.76'. Rainfall on June 20<sup>th</sup> of 2.25" resulted in 7.37 MG of infiltration. In contrast, 1.7" of rain on August 20<sup>th</sup> resulted in only 1.1 MG of infiltration with the river level below 15'.

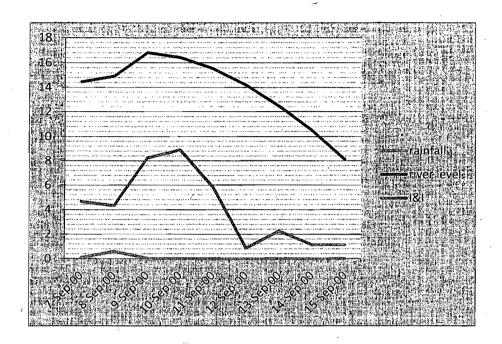
After six inches of rain on September 26, 2004 the river rose to 15.49' on the 27<sup>th</sup>, then to 19.61' on the 29<sup>th</sup>, and back to 15.58' on October 3<sup>rd</sup>. The average infiltration rate for this period was 9.9 MGD. That time there was not a major spill recorded.

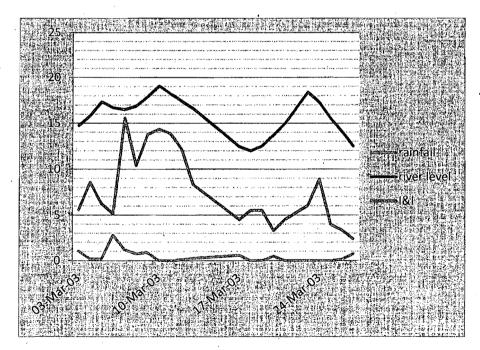
On April 1, 2005 the Withlacoochee plant suffered another major spill after the river again flooded over 16'. The average infiltration rate for the time the river was above 16' was 7.4 MGD.

During each of these events the Withlacoochee River flooded enough to cause flooding of Sugar Creek and covering of the manholes along Sugar Creek just upstream of the Withlacoochee Interceptor, as well as flooding of the interceptor all the way to the plant.

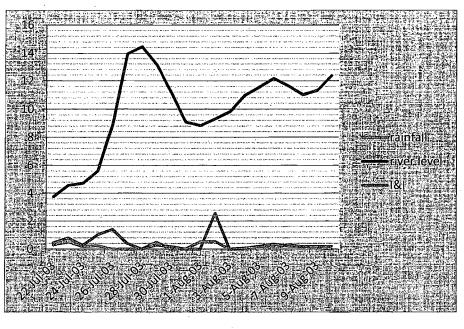
During the week of February 18<sup>th</sup> to 22<sup>nd</sup>, 2008 the Valdosta area received in excess of eight inches of rainfall. Five inches fell on February 21<sup>st</sup>, and another two inches on February 22<sup>nd</sup>. The heavy rainfall caused flooding of the Withlacoochee River and Sugar Creek, and a manhole cover and cone was knocked loose underwater causing high infiltration at the Withlacoochee plant. From February 22<sup>nd</sup> through February 25<sup>th</sup> the average infiltration was 10 MGD. This time the entrance of river water into the system was well documented because the Distribution/Collection Superintendent was over the manhole in a boat and had to fight the current of water entering the manhole. After this incident, in April 2008, these manholes were raised to keep them above future flood levels. Since raising the manholes we have experienced discharges from manholes in the Meadowbrook Drive and Park Lane areas. These manholes are just upstream of the ones that were raised, and are the ones that overflowed during the April 2009 flood. The City can expect to continue to have overflows along Meadowbrook and Park Lane during floods of the Withlacoochee River unless the flood waters can be kept out of the interceptor line.

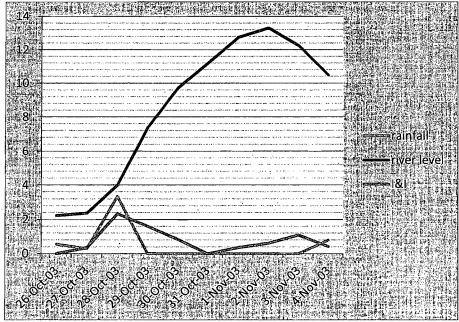
These charts display I&I at Withlacoochee during two periods when the Withlacoochee River level was above 16'. Note that the I&I and river level trends are closely related.





By contrast, with the river level below 16' the I&I more closely follows rainfall.





## CITY OF VALDOSTA SUMMARY AND ACTION PLAN TO REDUCE SANITARY SEWER OVERFLOWS

#### INTRODUCTION

In 2008 the City of Valdosta (City) conducted a comprehensive evaluation of the City's wastewater collection system with the goals of reducing infiltration and inflow (I/I) and sanitary sewer overflows (SSOs); planning for future development; and developing an on-going system rehabilitation strategy. Because simultaneous investigation and rehabilitation of every pipe and pump station is cost-prohibitive for the City, higher priority areas of the system were identified for immediate rehabilitation. In order to lay out the long-term capital improvement program (CIP), the projects were phased into 5-year timeframes based on the results of the capacity analysis and order of criticality. The projects identified for Phase 1 implementation are shown in **Table 1**.

In addition to the collection system evaluation, the City has initiated expansion of the Mud Creek Water Pollution Control Plant (WPCP), currently operating at its permitted capacity, to increase the treatment capacity to meet future growth, as well as rehabilitate the plant and provide higher quality wastewater effluent and biosolids. The Withlacoochee WPCP is operating under its permitted capacity, and does not require immediate expansion to meet the projected future growth. To improve reliability of the plant operation under wet weather conditions, the City proactively has scheduled the plant for rehabilitation of the existing treatment units.

## EXTREME WEATHER RELATED EVENTS CONTRIBUTED SIGNIFCANTLY TO SSOs and MAJOR SPILLS AT THE PLANTS

The City has been proactively addressing the need for sewer system rehabilitation and improvements to reduce the I/I and SSOs and is committed to the plans previously developed and outlined herein. However, several events have occurred over the past 2 years that have prevented the City from moving forward with the identified improvements.

The City of Valdosta has seen three very large wet-weather events in 2008 and 2009. A summary of each event is highlighted below:

- February 2008 10-25 year storm event The City received approximately 8 inches of rain over a 37-hour period. At the time the City was performing extensive flow monitoring in the Withlacoochee and Mud Creek basin, showing that the rain corresponds to a 10- to 25-year storm event. Of the SSOs reported in 2008 (total of 267,000 gallons), this storm resulted in 87,000 gallons of SSOs or 33 percent of the total volume for 2008. In regards to plant performance, Withlacoochee WPCP had one permit violation of their weekly permitted Total Suspended Solids (TSS), which classified as a "major spill" according to their NPDES permit corresponding to 54.7 MG.
- August 2008 Tropical Storm Fay The City saw approximately 12 inches of rain over a
  48-hour period during Tropical Storm Fay. Of the SSOs reported in 2008 (total of 267,000
  gallons), this storm resulted in 45,000 gallons of SSOs or 17 percent of the total volume

Table 1 - Implementation Schedule for Phase I Projects

Project Number	Project Description	Capital Cost (1)	1	M.		2009 L. L.	O N	D.I	FIM	2010		ON	n ı	FM	AN	201		sini	ND	ЛF	M.		1012		0.1	D.	Fi	Δ		13	sic	NIF	3 .11	FIM		2014		s ol	ND
W-1	Withlacoochee WPCP Storage Design Bid/Award Notice to Proceed/Construction	\$ 6,000,000	++																																				
W-3	Big Country PS Upgrade  Design Bid/Award Notice to Proceed/Construction  Ponderosa PS Upgrade  Design Bid/Award Notice to Proceed/Construction	\$ 800,000 \$ 150,000				,		1						pr (F pr fo to	nplei roce: FOX roce: or ea o mit	men ss to A De ss , t ch p lgat ity h d mi	tationit clara he ( ump e ea	of the on Sci igate ition ity of stati ch stati ill yea	dan 1833 Valcion in itlon	le fo nage DR losts ord agai	or Ph s of GA) a sul ser t inst	iase Ma sevi bmit o re futu fina	I Pro rch : erely ted cove re fl	ject 26,24 dar in Ju r the codi	s has 009 t nage ly 20 e cos ng.	bee hrou d the 09 th ts of	n in igh A ise p ne Pr brin	susp lipril nump rojec ging rning	ense 13, 2 stat t Wo each	per 2009 tions orksi n sta	stor stor Pericetri	a FE m ever the and to pr	MA vent. FEN Haz e-dis	revie . The AA d ard I saste	ew and selection of the	nd ap od D er re atio nditi	ppro Isas Ilief n Pla ions	ter ans and	
W-4	Lower Withlacoochee Pump Station & Force Main Cesign Bid/Award Notice to Proceed/Construction	\$ 21,200,000																																					T
MC-1	Mud Creek Outfall - CCTV & Manhole Inspection	\$. 160,000																	Ш													Ш		li					
MC-2	Knights Creek Outfall - CCTV & Manhole Inspection	\$ 188,000	Ш										L																			H							Ш
W-5	Withlacoochee Outfall - CCTV and Manhole Inspection	\$ 330,000	П					.]							Ц						11											П			Ш				
W-29	Priority Part of Mini-Basin \$A Assessment	\$ 250,000									ļ. ļ.										Ш																		Ш
MC-4	Structural Evaluation of Lukeland Pump Station	\$ 8,000	Ш	Ш												P			Ш														П						
ŀ	Annual Rehabilitation (2)	\$ 2,080,000	Ш	Ш											Ш	Ш			Ш							П	-									4			Ш
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	Annual Rehabilitation (2)	\$ 2,080,000														11																							

<sup>1)</sup> This is the Total Capital Cost for the project including 30% Construction Contingency and 25% for Engineering, Legal, and Administration
2) Annual Rehabilitation assumes the rehabilitation of 1% of both the Mud Creek and Withlacoochee basins gravity sewer per year
3) Anticipated finish dates are based on conceptual designs; actual finish date depends upon selectedfor the implementation design alternative

for 2008. In regards to the plant performance, neither Mud Creek or Withlacoochee WPCP had any permit violations; however, they did report a "major spill" due to their daily TSS being over 50 percent of their weekly permitted Total Suspended Solids (TSS), which classified as a "major spill" according to their NPDES permit corresponding to 27 MG and 6.3 MG at Withlacoochee and Mud Creek, respectively.

In 2008, both of the extreme wet-weather events above represented 49 percent of the total SSO events in the City of Valdosta sewer system and 10 of the 11 total SSO events. The only other SSO reported in 2008 was on November 2008 for 135, 000 gallons.

• April 2009 FEMA Declared Disaster - The Flood Disaster (FEMA Declaration 1833 DR GA) incident of March 26, 2009 through April 13, 2009 resulted in massive flooding in Lowndes County. The City worked tirelessly protecting the Withlacoochee WPCP influent pump station from flooding and becoming inoperable. The City, with the help of volunteers from other City departments, troops from Moody Air Force Base, and approximately 120 college students (over 300 volunteers), built an earthen berm to protect the pump station to keep the plant in-service and continue to provide service to the citizens of Valdosta. Although the pump station was protected, the Withlacoochee River rose out of its banks and flooded the entire tertiary treatment processes of the plant (solids treatment, disinfection and filtration processes).

In July 2009, per the FEMA disaster relief process, the City submitted the Project Worksheets and Hazard Mitigation Plans for the plant in order to recover the costs of bringing the plant to pre-disaster conditions and to implement measures to mitigate against future flooding for pump stations and the Withlacoochee WPCP. The City was prevented from performing any work related to the plant or pump stations while waiting on a determination of funding assistance from FEMA. Design of any improvements to the plant could not and cannot be performed until such time as FEMA determines whether the pump station will be relocated due to its present location in what DNR has agreed will be within the re-defined 100 year flood plain/flood way. The City has only recently (April 2010) been notified of the preliminary determination of funding assistance as it relates to Withlacoochee WPCP and pump stations; funding from FEMA has not been granted and is now on indefinite hold. For this reason the City has been prevented from making improvements and moving forward on projects previously identified as helping the City reduces its I/I and overflows.

In addition, the City has requested the participation of DNR in addressing regional stormwater issues that are partially to blame for the volume of inflow and infiltration. The City has studied the drainage basin and identified that a drainage basin of approximately 2,500-square mile exists, of which the City proper is approximately 1 percent. However, this stormwater is converging at a location where the Little River and the Withlacoochee meet, and this is the cause of the flood disaster on March 29, 2010 through April 13, 2010. Due to unknown reasons and beyond the control of the City, unprecedented levels of stormwater from the region are now directly and negatively affecting the City and its wastewater and stormwater system. The City has also learned that the state has been releasing large volumes of stormwater from Reed Bingham State

Park near Adel, during and prior to major rain events, further affecting the City and its infrastructure. The state's regional water council has agreed to investigate this matter under the direction of Cliff Lewis.

### SUMMARY OF ONGOING PROJECTS TO REDUCE THE NUMBER OF SSOs IN THE VALDOSTA SEWER COLLECTION SYSTEM

The City has been working to implement the following sewer system capital improvement projects related to the reduction the number of SSOs in the sewer collection system:

PROJECTS AIMED AT REDUCING BYPASSES AND OVERFLOWS AT THE PLANTS

#### 1) Mud Creek WPCP Expansion

In 2007, the City initiated work to upgrade the Mud Creek WPCP from 3.2 million gallons per day (mgd) to 5.7 mgd average daily flow. The construction started in October 2009 and it is anticipated that the plant expansion will be completed by October 2011. The expansion will allow the plant to handle peak flows up to 17.1 mgd. This project is budgeted at \$45 million and is funded through GEFA and ARRA.

### 2) Withlacoochee WPCP Flow Equalization Storage and the Lower Withlacoochee Pump Station and Force Main (Project W-1 and W-4 in Table 1)

Based on the Sewer System Modeling and Capacity Evaluation Report, January 2010 installation of a flow equalization basin at the Withlacoochee WPCP would allow for the peak wet-weather flows to be contained in a storage basin at the plant. In addition to the storage basin, a dry- and wet-weather pump stations(s) and force main would be installed in the system to pump the stored wet weather flows to the Withlacoochee WPCP for treatment after the peak flow events. It is anticipated that improvements to the existing influent pump station and preliminary treatment at the plant would be implemented as part of this project. The project aims to reduce the wet-weather inflow along the Withlacoochee Interceptor. An RFP is currently being advertised for selection of a consultant to design the improvements. Construction of the first phase of the project is anticipated to begin in spring 2011. This project is budgeted at \$30 million for the design and construction. Funding will be provided either through GEFA (application for present deadline being submitted) and/or Recovery Bonds administered by Georgia DCA from the federal stimulus program, which the city is currently evaluating and seeking the required bond counsel for guidance.

#### 3) Withlacoochee WPCP Upgrade

The City scheduled the upgrades and rehabilitation of the Withlacoochee WPCP unit processes to increase the plant reliability under wet weather operations. The project was designed, equipment delivered and construction work underway when the FEMA Declaration 1833 DR GA occurred. The equipment remains in storage pending approval of mitigation efforts from FEMA and a decision on the location of the pump station. The work is currently on hold pending a final resolution on a mitigation plan resulting from severe flooding (Flood Disaster - FEMA Declaration 1833 DR GA) in spring 2009. The City has budgeted \$1.25 million for the project.

#### PROJECTS AIMED AT REDUCING SSOs RELATED TO FOGS

#### 4) Implementation of Fats, Oils & Grease (FOG) Control Policy

The City prepared the FOG Ordinance to prevent excessive introduction of grease into the sewer system and treatment plants. The ordinance is being reviewed by the City Attorney and is scheduled for first-reading on May 6, 2010 and adoption on May 20, 2010.

#### PROJECTS AIMED AT REDUCING SSOs IN THE COLLECTION SYSTEM

### 5) Mud Creek and Knights Creek Interceptors Condition Assessment and Rehabilitation (Projects MC-1 and MC-2 in Table 1)

The City has prepared an RFP to solicit contractors for the cleaning and inspection of the Mud Creek and Knights Creek Interceptors. The purpose of this project is to verify the structural conditions of pipes and manholes so that a proper rehabilitation plan can be implemented to reduce I/I. The City has allocated \$350,000 funding in FY 2010 for cleaning and inspection of these two major interceptors, \$2.38 million in FY 2011 for rehabilitation, and is funded through SPLOST Funding.

#### 6) Annual Rehabilitation Program

The City identified the top 10 projects to clean, inspect and repair (as required) the critical sewer collection pipes and laterals throughout the system. The identified projects as well as other short-term recommendations are included in **Appendix A**. The priority list was developed based on the City's understanding of the past SSOs and I/I estimate based on the flow monitoring. The City included Project 1 (Cleaning, Inspection and Rehabilitation of the sewer system near the Valdosta Mall Center) for FY 2010. Project 1 has been allocated \$350,000 and is funded through GEFA. Sewer System Condition Assessment for Rehabilitation has been allocated \$350,000 through GEFA funding for FY 2010, and \$600,000 through SPLOST funding,

#### 7) Pump Stations Improvements (Projects W-2 and W-3 in Table 1)

The City identified Ponderosa Drive, Big Country Club, Mack Drive and Eastwind lift stations for immediate upgrades and expansion to handle the 2-year 2030 flows. The design is ongoing, and it is anticipated that the lift station improvements would be advertised for bid by the end of May 2010. FEMA delay in approving the Ponderosa and Big Country stations has delayed the implementation of this work. Pending bid approval, the City intends to issue a Notice to Proceed for the lift stations in July 2010. This project has been allocated \$1 million in the City's budget and \$500,000 in GEFA funding.

In addition to lift stations identified as Project W-2 and W-3 and Mack Drive and Eastwinds, the City has identified 8 additional lift stations for the upgrade and rehabilitation in FY 2011. The project estimated cost is \$2 million. The request for GEFA funding will be submitted under the next round of CWSRF.

## PROJECTS AIMED AT EFFECTIVELY TRACKING AND ATTACKING SSOs IN THE COLLECTION SYSTEM

#### 8) Implementation of SCADA and CMMS Systems

The City initiated implementation of a system-wide SCADA system that will provide real time, remote monitoring and control capabilities for all lift stations in the system. All new lift stations will be required to include a radio antenna and SCADA system in the design. The SCADA system for the existing lift stations will be implemented in accordance with the upgrade schedule. The City scheduled 10 lift stations for the upgrade in FY 2011. The project is budgeted at \$400,000 for FY 2010.

In addition to the SCADA system, the City is in the process of implementing a GIS-based decision system to automate a significant portion of the recommendations based on the comprehensive CCTV inspection database and the defect codes/values assigned. Based on the defects identified and general pipe conditions, as well as criticality factor, the recommendations of frequency of the inspection and prioritizing of the preventive maintenance work would be assigned to each pipe, which will help the City's personnel track the rehabilitation progress and plan ahead for preventive maintenance activities.

As shown above, the City has a well defined and aggressive capital improvements program to address the most critical areas of concern and reduce SSOs frequency in the sewer collection system and at the treatment plant sites. As noted, the City will be investing over \$87 million in the next 5 years to address these issues in the City's sewer collection/treatment system. In addition, Attachment B is a presentation made to EPD on April 21, 2010 discussing the City's assessment of the issues and the steps being taken to address the issues. Also included is a summary provided in a letter from Henry Hicks, Utilities Director, to Bill Noell on April 20, 2010.

The City of Valdosta is fully committed to addressing the issues, and in advance of contact from EPD had already implemented all the projects and planning identified in this correspondence. The City has demonstrated good faith by requesting the meeting with EPD and by presenting a plan already developed, with time lines and funding sources, to EPD. The City has been unable to move forward and control its own destiny due to the inaction of FEMA for over one year, despite multiple attempts at all administrative and political levels to receive a decision. City officials will be meeting with FEMA in Washington D.C. on May 19, 2010 with the support of Georgia's congressional delegation including Senators Chambliss and Isakson and Congressman Kingston and Bishop. To this point, the City has been a victim of FEMA inaction, which is beyond the control of the City.

#### ATTACHMENT A

# SHORT-TERM RECOMMENDATIONS FOR REDUCING THE NUMBER OF SSOs IN THE CITY OF VALDOSTA

#### PREVENTIVE ACTION PLAN



#### **Draft Memorandum**

To: John Whitehead, Deputy City Manager – Operations, City of

Valdosta

Henry Hicks, Director of Utilities, City of Valdosta

From: Kart Vaith, CDM

Leslie Samel, CDM

Anna Neugebauer, CDM

Date: April 12, 2010

Subject: Short-Term Recommendations for Reducing the Number of the SSO

in the Valdosta Sewer Collection System

A list of short-term recommendations for reducing the number of Sanitary Sewer Overflows (SSO) in the City of Valdosta Sewer Collection System is summarized below.

1. Immediately deploy the City's personnel to clean, inspect and repair (as required) the critical sewer collection pipes/laterals. The top 10 identified projects are listed in Table 1. This list was developed based on CDM's understanding of the past SSOs within the City's system and I/I estimate based on flow monitoring. It should be noted that the cleaning, inspection and rehabilitation of Mud Creek and Knights Creek Outfalls are not listed since these two projects have been already initiated by the City.

The condition assessment of these projects (with the exception of the Withlacoochee outfall) can be done by the City's personnel using their CCTV equipment and oversight from CDM.

Implement Fats, Oils & Grease (FOG) Control Policy

It is recommended that the City implement the Grease Control Policy that would prevent the excessive introduction of grease into the sewer system and the treatment plants. The policy should be designed to implement and enforce the grease discharge by enforcing all nonresidential facilities involved in the preparation or service of foods to install and maintain a grease trap or interceptor. Example of Grease Control Policy is showed in the **Appendix A**.

Implement Essential Preventive Maintenance Program for the gravity pipes. This
program includes Lateral Inspection and Rehabilitation/Replacement Program, and
Manhole Inspection and Rehabilitation Program

It is recommended that the City proactively cleans and inspects EVERY sanitary sewer pipe with the frequency determined by criticality and financial means. As with all cleaning and inspection programs, some pipes will require little or no cleaning while others that are prone to sedimentation (flat slopes / < 2ft/sec), roots growth or grease build up will require more intensive cleaning.

It is recommended that the City develop a GIS-based decision system (CMMS) to automate a significant portion of the recommendations based on the comprehensive CCTV inspection database and the defect codes/values assigned. Based on the defects identified and general pipe conditions, as well as criticality factor, the recommendations on frequency of the inspection and prioritizing of the preventive maintenance work could be assigned to each pipe, which would help the City's personnel to track the rehabilitation progress and plan ahead preventive maintenance activities. Frequency in which a sewer is cleaned and televised should be based on criticality, financial resources, and schedule of structural improvements.

 Implement Storm Preparation Program for the Sewer System and the Wet Weather Operating Protocols for the Mud Creek and the Withlacoochee WPCPs

The following are recommended to prepare the plants and system for an upcoming storm:

Step 1 - Track and anticipate wet weather events

Step 2 - Assure that EVERYTHING is ready to receive the increased flows

- a) Inspect and clean existing equipment
- b) Inspect standby equipment and tankage, and place them in service
- Prepare emergency by-passes to by-pass the processes with smallest hydraulic capacity
- d) Clean all process tanks prior to the storm
- e) Prepare to operate the plant manually, not using automatic controls
- f) Reduce recycling rates
- g) Modify the pump station control levels to maximize the wet well storage and induce the available collection system storage (i.e., Mud Creek, Knights Creek and Withlacoochee Outfalls were designed to provide storage during wet weather events)

#### Step 3 - Operate plant manually during the storm event

- a) Screening
  - i. Place all screens in service
  - ii. Increase screen cleaning frequency
  - iii. Prepare screenings containers
- b) Grit Removal
  - i. Place all grit removal units in service
  - ii. Shut-off air to aerated grit chambers (for Withlacoochee WPCP)
  - iii. Adjust velocity controlled grit chamber and increase grit removal rate
  - iv. Prepare grit containers
- c) Primary Clarifiers (for Withlacoochee WPCP)
  - i. Place all units in service
  - ii. Maintain low sludge blanket levels
  - iii. Increase scum removal rate
  - iv. Consider chemical addition to increase removal efficiency
- d) Bio-towers (for Withlacoochee WPCP)
  - Place all units (including pumps) in service
  - ii. Modify the pumping controls to maximize the storage
- e) Activated Sludge
  - i. Control activated sludge quality (avoid filamentous sludge)
  - ii. Lower return sludge rate
  - iii. Monitor unit efficiency and adjust aeration as needed
  - Lower or shut off air in last passes of aeration tanks
- f) Secondary Clarifiers
  - i. Place all clarifiers in service
  - ii. Maintain low sludge blanket level
  - iii. Consider chemical addition to increase settling
- g) Disinfection
  - i. Place all units in service
  - ii. Manage chlorination rates and increase residual monitoring
  - iii. Chlorine demand will increase if bypassing preliminary effluent

<u>Step 4</u> – Monitor influent characteristics and critical process operations under wet weather flows

<u>Step 5</u> - Develop a database to document plant response to wet weather flows and utilize data to make process decisions for wet weather events

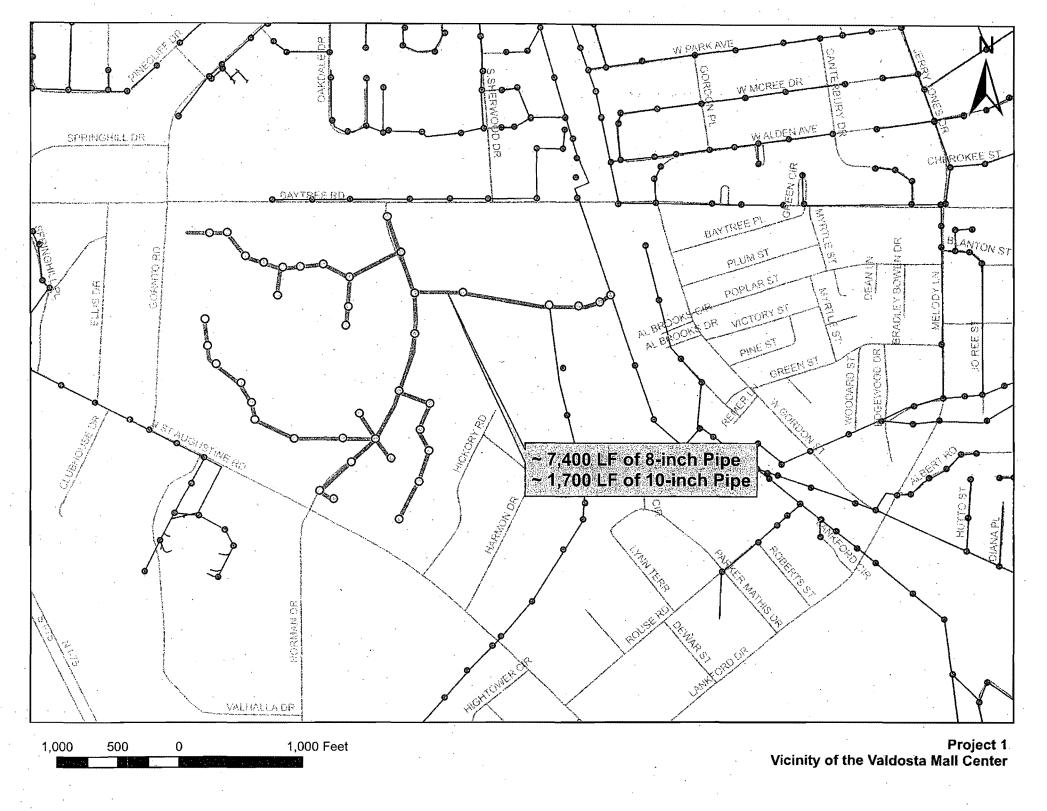
Table 1 - Top 10 Identified Projects to Reduce the SSO in the Valdoste Sewer Collection System  $\,\cdot\,$ 

Project	Location	. Scope of Work	Project Purpose	Map Number	Frequency Required	Minimum Cleaning and Inspection Duration **
1	Vicinity of the Valdosta Mall Center	Clean, inspect and repair collection system	The main purpose of this project is to remove accumulated grease in the pipelines from the restaurants in the Veldoste Mail Center.	1	Annual (until FOG Control Policy Implemented)/per CCTV condition assessment rating	- 9,100 LF of Pipe = 6 days
2	Withiacoochee Outfall	Clean	The main purpose of this project is to restore capacity of the outfall and maximize storage capacity during the wet weather.	2	Per CCTV condition assessment rating	- 19,200 LF of Pipe = 26 days (assumed 750 LF/day due to limited accessibility)
	Ponderosa Drive Pump Station Service Area	Clean, inspect and repair collection system and laterals	The main purpose of this project is to identify source and reduce inflow and infiltration (I/I) in this aged erea, focusing on laterals.	3	Per CCTV condition assessment rating	~ 19,500 LF of Pipe = 13 days
4	Rogers Street Pump Station Service Area	Clean, inspect and repair collection system and laterals	The main purpose of this project is to identify source and reduce inflow and Infiltration (I/I) in this eiged area, it is suspected that the I/I occur not only in the gravity pipe, but also along laterate.	4	Per CCTV condition assessment rating	~ 53,500 LF of Pipe = 36 days
5		Clean, inspect and repair collection system	The main purpose of this project is to remove accumulated grease in the pipelines from the Five Points Shopping Center, and identify source and reduce I/I in this aged area.	5	Annual (until FOG Control Policy Implemented)/per CCTV condition essessment rating	~ 41,300 LF of Pipe = 28 days
6		Clean, inspect and repair collection system	The main purpose of this project is to remove accumulated debris and grease from the Veldosta Prison.	6.	Annual	~ 11,500 LF of Pipe = 8 days
		Clean, inspect and repair collection system and laterals	The main purpose of this project is to identify source and reduce IA in this eged erea, it is suspected that the IA occur not only in the gravity pipe, but also along laterals.	7	Per CCTV condition assessment rating	~ 79,400 LF of Pipe = 53 days
		Clean, inspect and repair collection system and laterals	The main purpose of this project is to identify source and reduce inflow and infiltration (i/i) in this eged area, it is suspected that the i/i occur not only in the gravity pipe, but also along laterals.	8	Per CCTV condition assessment rating	~ 31,400 LF of Pipe = 21 days
		Clean, inspect and repair collection system and laterals	The main purpose of this project is to identify source and reduce inflow and infiltration (I/I) in this aged area. It is suspected that the I/I occur not only in the gravity pipe, but also along laterals.	9 .	Per CCTV condition essessment rating	~ 35,100 LF of Pipe = 24 days,
		Clean, inspect and repair collection system and laterals	The main purpose of this project is to identify source and reduce I/I in this aged area. It is suspected that the I/I occur not only in the gravity pipe, but also along laterals.	10	Per CCTV condition assessment rating	~ 125,600 LF of Pipe = 84 days

<sup>\*</sup> identified gipes for assessment are shown in vellow

Repair time is dependent/very upon results of CCTV inspection

<sup>\*\*</sup> Assumed 1,500 LF/day for pipes 8 to 15-inch pipes (assumes optimum CCTV/deaning conditions such as: water can easily accessible from a local hydrant, a disposal site for debris is locally available, traffic control is minimal, excessive heavy cleaning is not required)

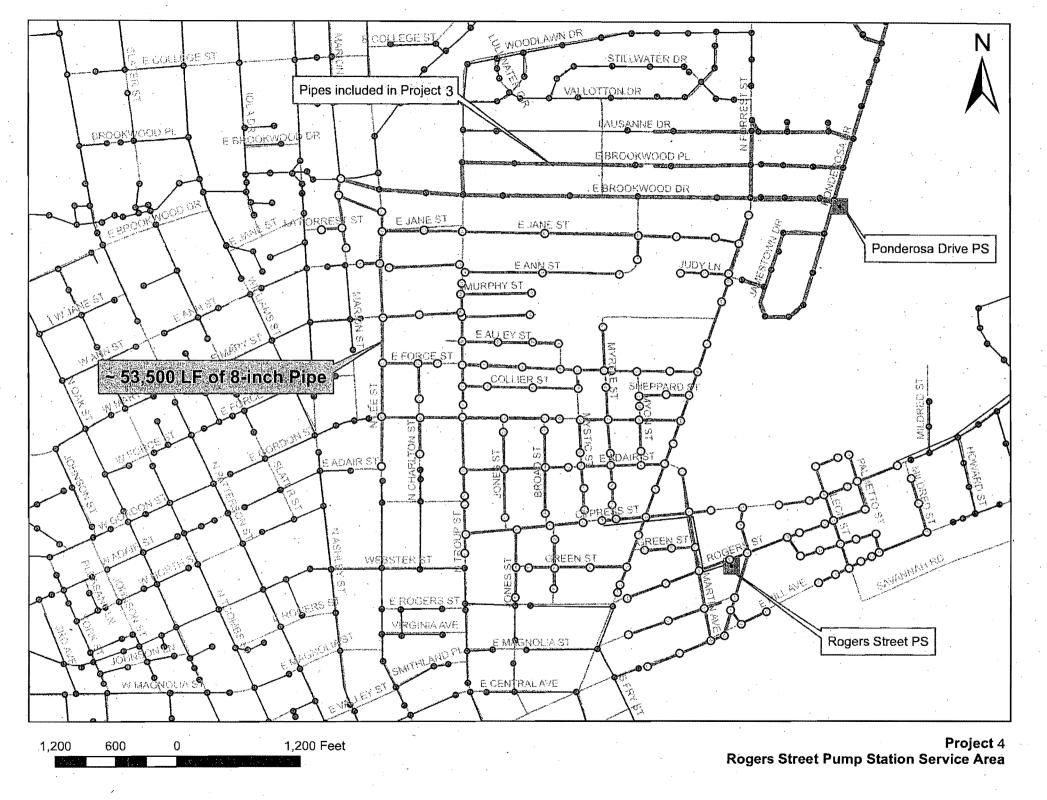


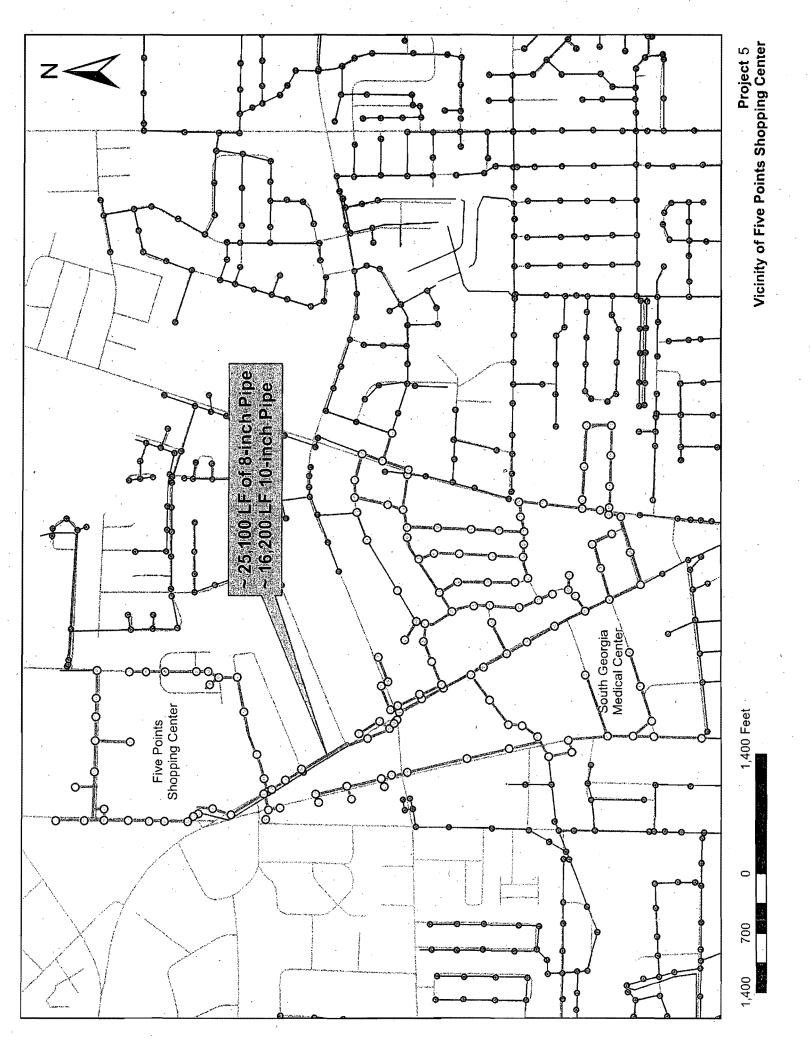
Project 2 Withlacoochee Outfall

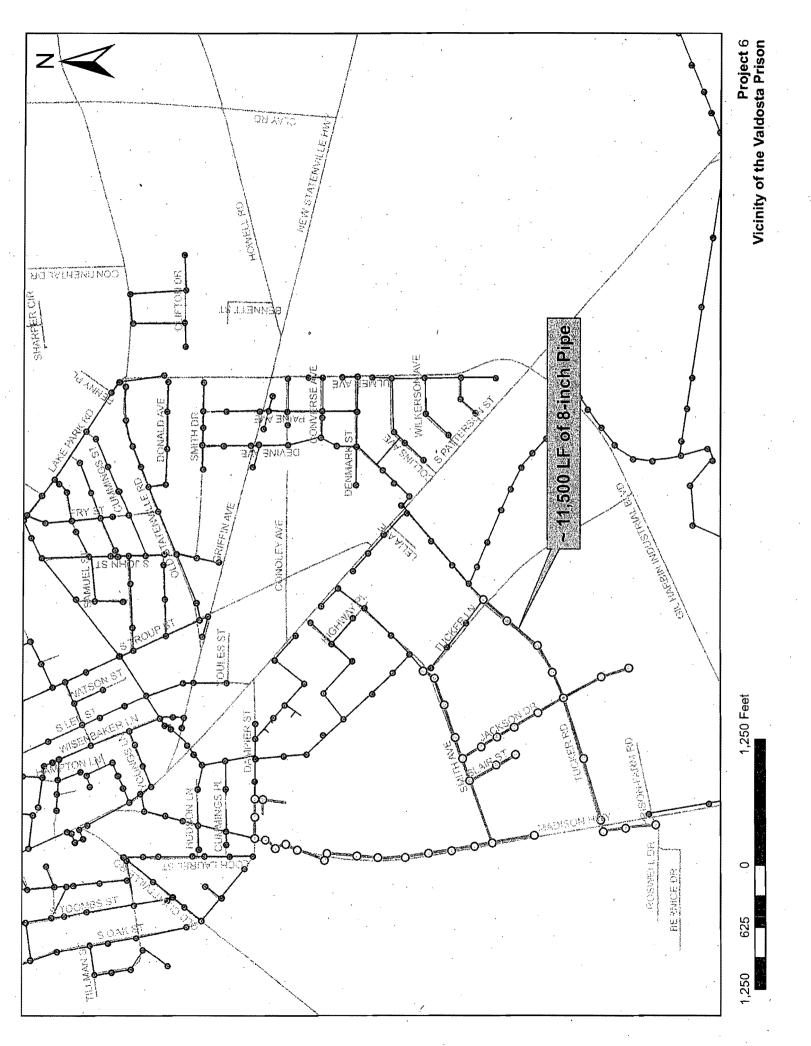


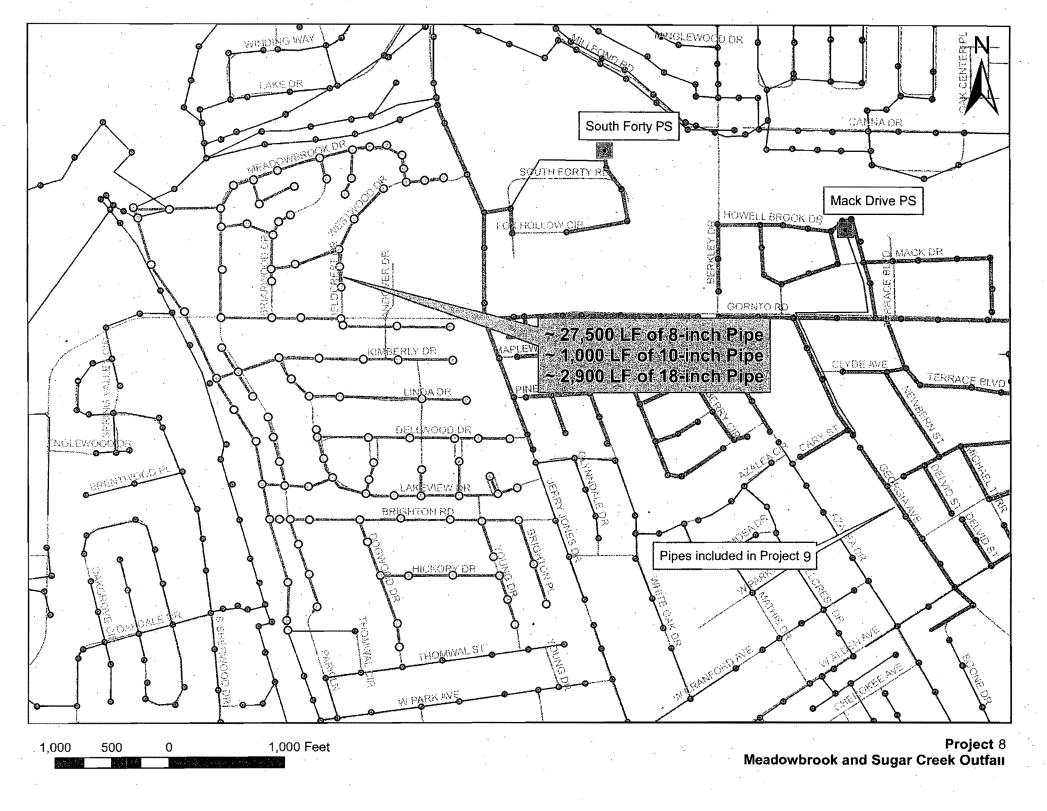


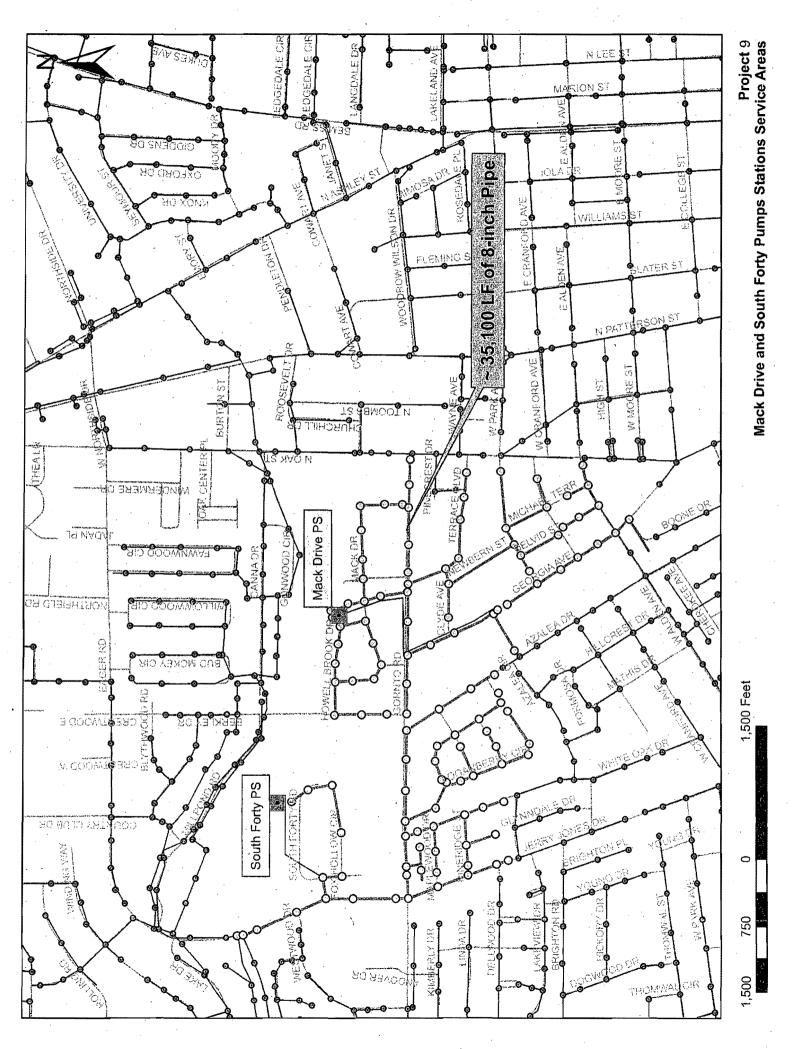
Ponderosa Drive Pump Station Service Area

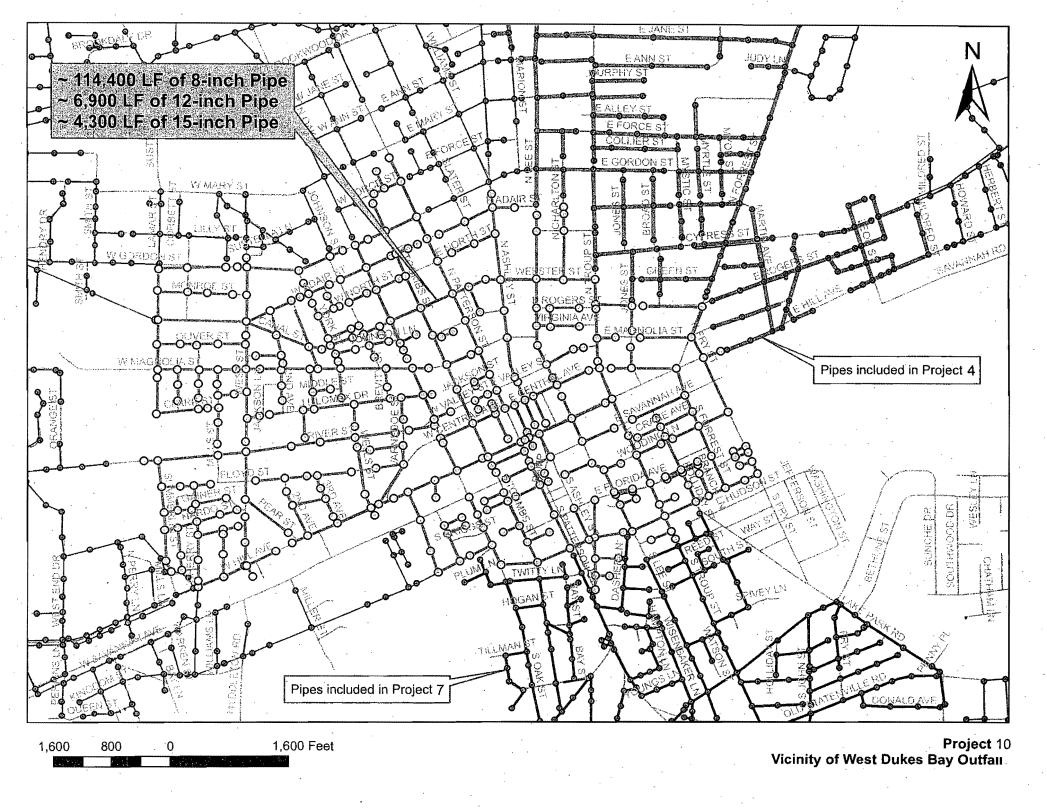






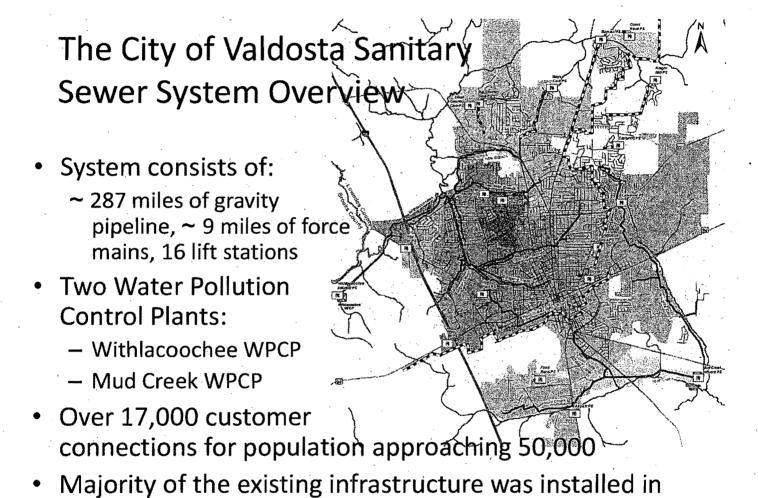






### **ATTACHMENT B**

## PRESENTATION SUMMARY GIVEN ON 4/21/10 TO EPD



1940s, with expansions in 1960s and 1970s

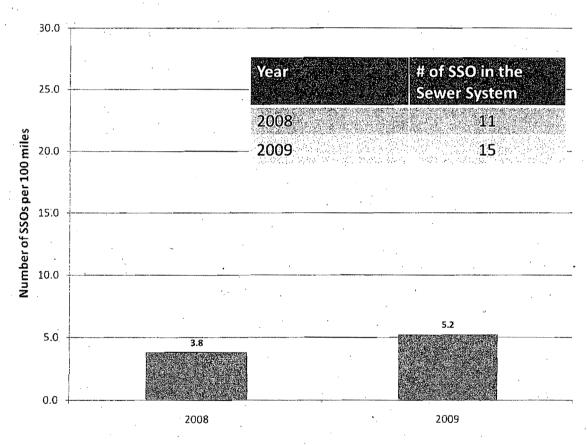
## Major Spills Summary

- February 2008 (10 to 25-year storm event)
  - 54.7 MG discharge to Withlacoochee River due to plant hydraulic overloading
- August 2008 (TROPICAL STORM FAY)
  - 27 MG discharge to Withlacoochee River, 6.3 MG discharge to Mud Creek due to plants hydraulic overloading
- April 2009 (FEMA DECLARED DISASTER 1833 DR GA)
  - 51.9 MG discharge to Withlacoochee River due to plan hydraulic overloading
- December 2009
  - 5.5 MG discharge to Mud Creek due to the influent manhole collapse

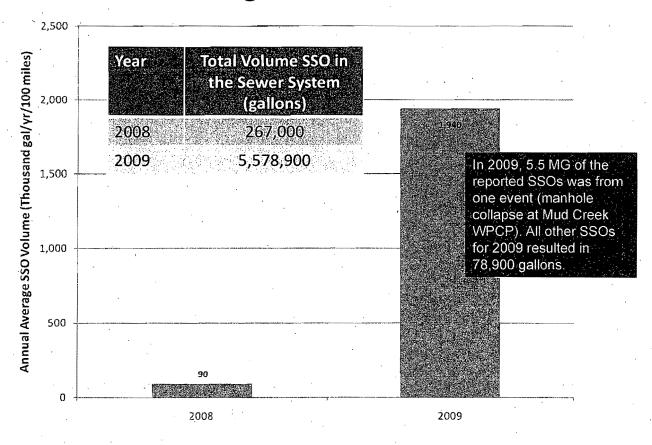
## Reporting Inaccuracies

- City was reporting "major spill" based on a daily exceedance of TSS or BOD of 1.5 times weekly average.
- Permit reads: "A major spill is any discharge of raw sewage that exceeds 10,000 gallons or results in a water quality violation....by a facility that exceeds the weekly average permitted effluent limits of BOD & TSS by 50 percent or greater".
- Valdosta's reporting was incorrect, results in only one reported "major spill" at the WPCPs on Feb. 2008.
- Mud Creek Dec. '09 volume incorrectly reported.

## City of Valdosta Historical Annual Number of SSOs/100 miles



## City of Valdosta Historical Annual Average Volume of SSOs/100 miles



## The City of Valdosta Performed Comprehensive Evaluation of the Sewer System

- Extensive system-wide flow monitoring to assess I/I
- System capacity evaluation to find hydraulic constraints
- Condition and criticality evaluation to determine "where to start"
- Developed a phased 30-year CIP for Improvements and Condition
   Assessment
- Most of identified projects in Phase 1 are underway

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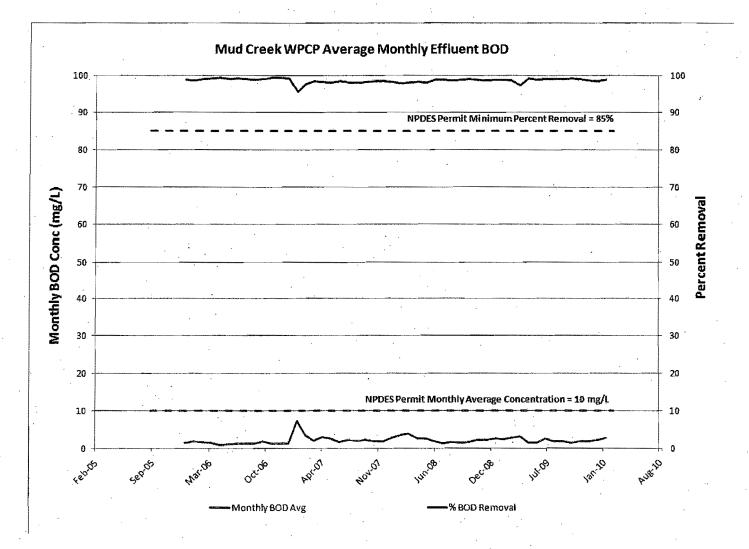
is Thri is the Rical Capids Cost for the project advantag 30% Combustion Costingency and 25% for Engineering, Legill, and Administrati 2) Aurusp Rehaptionism assumes the rehabilishing of 1% of both the Auri Creak and Williagopoches busing gavely senum serve an

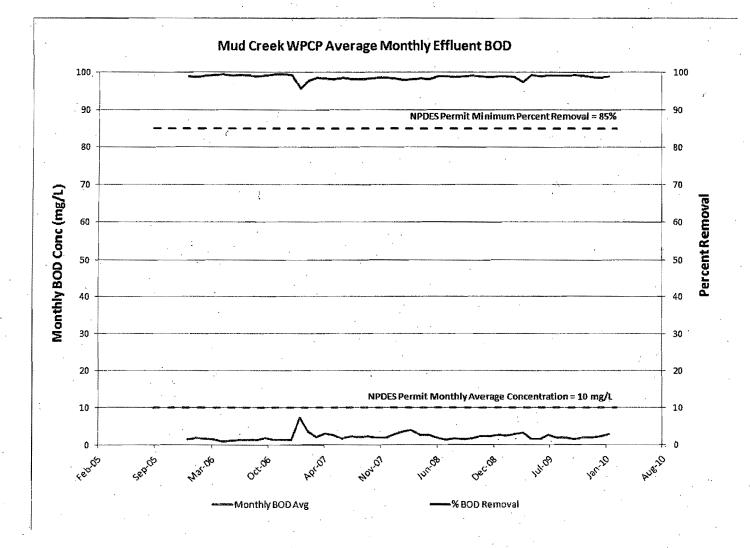
## Grease Management Program

- City prepared the FOG Ordinance to prevent excessive introduction of grease into the sewer system.
- The ordinance is being reviewed by the City Attorney and is scheduled for adoption in May/June 2010.

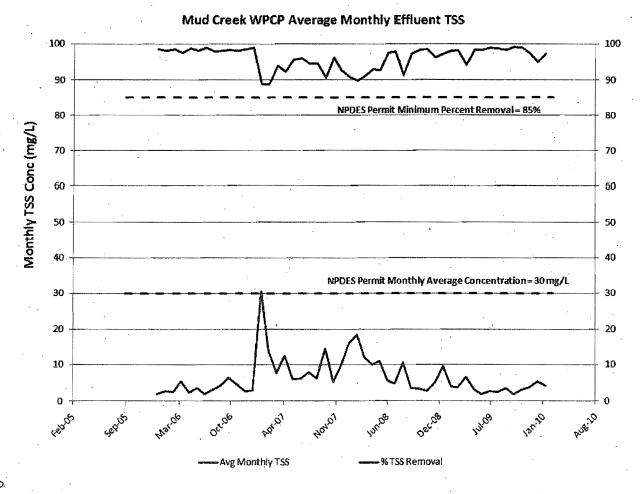
## Mud Creek WPCP Consistently is Meeting Effluent Permit Limits for BOD & TSS

	2006	2007	2008	2009	2010	Average
BOD Concentration 🖟						
Weekly Average	100%	98%	100%	100%	100%	99%
Monthly Average	100%	100%	100%	100%	100%	100%
BOD % Removal	1 miles					
Monthly Average	99.2%	98.2%	98.6%	98.9%	98.6%	99%
TSS Concentration						
Weekiy Average	1.00%	95%	96%	97%	100%	97%
Monthly Average	100%	100%	100%	100%	100%	100%
TSS % Removal						
Monthly Average	The State of the S					
Vielininy Average	98.4%	93.6%	94.5%	97.9%	95.5%	96%



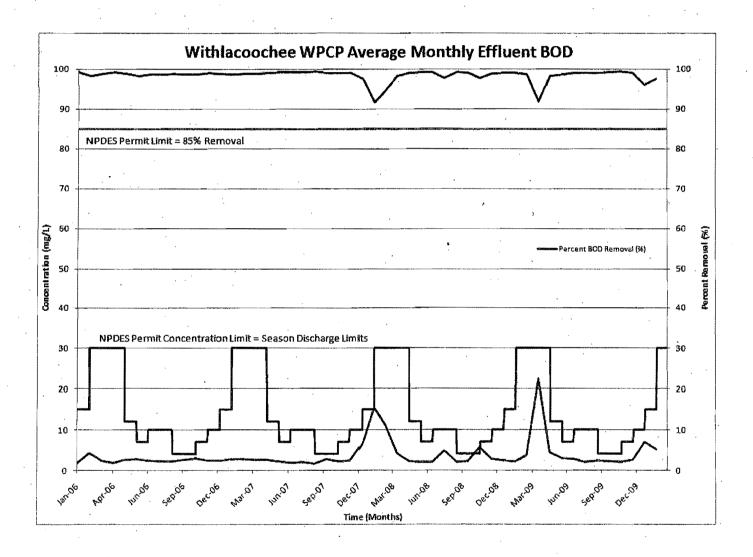


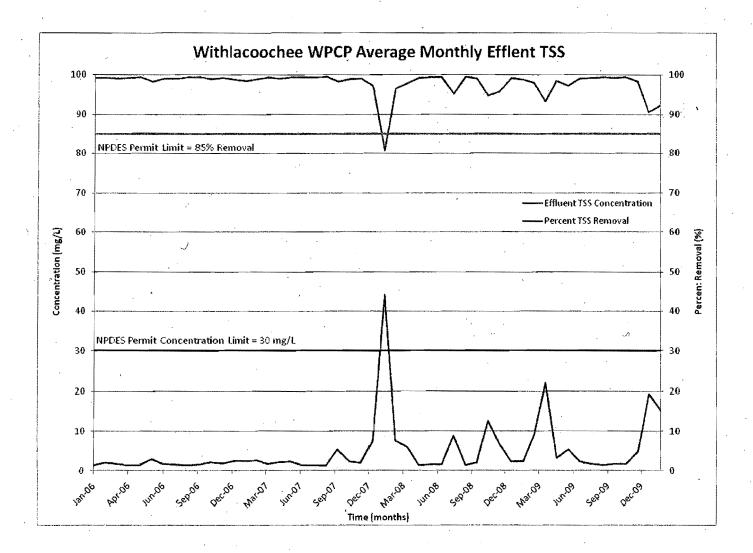




# Withlacoochee WPCP Consistently is Meeting Effluent Permit Limits for BOD & TSS

	2006	2007	2008	2009	2010	Average
BOD Concentration						
Weekly Average	100%	100%	100%	100%		100%
Monthly Average	100%	100%	100%	100%	.100%	100%
BOD % Removal						
Monthly Average	98.8%	99.1%	97.7%	98.4%	96.9%	98%
TSS Concentration						
Weekly Average	100%	100%	96%	96%		98%
Monthly Average	100%	100%	92%	100%	100%	98%
TSS % Removal						
Monthly Average	99.1%	99.0%	96.2%	98.3%	91.3%	98%





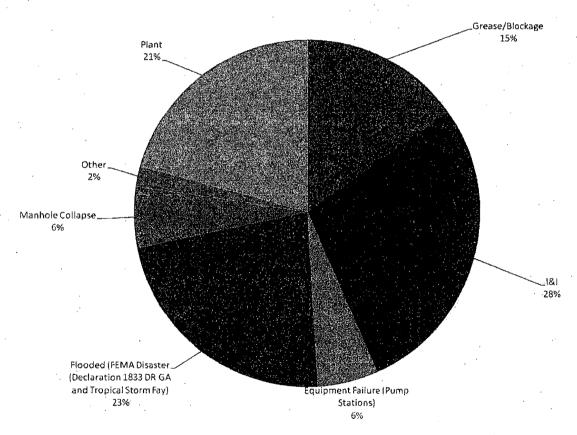
## City of Valdosta Utility Department Planned Capital Improvements Projects over \$200,000

Project Name	Estimated Cost*	Anticipated Finish Date*
Mud Creek WPCP Expansion	\$.45,000,000	2011
Withlacoochee WPCP Flow Equalization and the Lower Withlacoochee PS	\$ 30,000,000	2013
Withlacoochee WPCP.Upgrade and Rehabilitation	\$ 1,250,000	2012
Mud Creek and Knights Creek Interceptors Condition Assessment and Rehabilitation	\$ 2,380,000	2010/2011
FY2010 and FY2011 Annual Sewer System Rehabilitation Program	\$ 1,300,000	2011
Pump Stations Improvements	\$ 3,500,000	2011
SCADA and CMMS Implementation	\$ 400,000	2010/2011

<sup>\*</sup> Estimated costs & anticipated finish dates are based on conceptual designs; actual finish date depends upon selected design alternative for the implementation

## City of Valdosta Causes of SSOs – Overall Percentage

Data: Jan 2008 – April 2010





## CITY OF VALDOSTA, GEORGIA

Water, Sewer, and Drainage Department

Leon V. Weeks DIRECTOR OF UTILITIES

October 23, 2007

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, GA 30354

RE: Major Spill Report

Withlacoochee WPCP, NPDES Permit # GA0033235

Dear Mr. Noell;

On Thursday, October 18, 2007 the Valdosta area received rainfall of approximately 1.5 inches. This resulted in an increased flow at the Withlacoochee WPCP which peaked at a rate of 13 MGD. Currently, the secondary clarifier No. 4 is out of service for repair. The peak flow caused a hydraulic overload of the remaining clarifiers that are in service. This caused the loss of a portion of the activated sludge blanket in Clarifier No. 3.

The total suspended solids result in the composite sample for October 18<sup>th</sup> was 78 mg/l with an average daily flow of 6.3 MGD. This meets the definition of a "Major Spill". The City has started the required upstream/downstream monitoring and will comply with public notification requirements of the "Rules and Regulations for Water Quality Control", 391-6-3.

The repair of the clarifier No. 4 requires excavation and repair of a buried eccentric plug valve. The Utilities Department has determined that a safe and effective repair will require construction of a concrete valve box that will provide access now and in the future. Funds for this construction are available. Drawings are now being prepared and construction will follow as soon as possible.

Sincerely,

Leon V. Weeks

Director of Utilities

CC: Larry Hanson





## CITY OF VALDOSTA, GEORGIA

JOHN L. WHITEHEAD, III
DEPUTY CITY MANAGER
OPERATIONS

Mr. Bill Noell
Compliance and Enforcement East
Environmental Protection Division

Atlanta, GA

August 30, 2008

RE: Major spill permit # GA 0020222

Dear Mr. Noell

During the period of August 22nd and August 23rd, the Valdosta area received heavy rains from Tropical Storm Fay. Both of the wastewater treatment plants experienced high flows. The Mud Creek facility, rated at 3.3 MGD average daily flow, received two days of 7.9 MGD and was still experiencing high flows on Tuesday, August 26th. During the high flows part of the secondary sludge was carried from the secondary clarifiers into the chlorine contact chamber and settled there. On Tuesday, August 26th this sludge began to rise from the bottom of the contact chamber resulting in high Total Suspended Solids. This was discovered in the composite sample taken August 26th and analyzed on August 27th. The effluent TSS result was 68mg/l, which is greater than 1.5 times the seven day maximum allowed by the permit. This constitutes a Major Spill as defined in the referenced permit. The amount of the spill was the daily flow for August 26th, 6.3 MG. Upon discovering this problem the City reported by telephone as required and immediately began upstream/downstream sampling of the receiving stream.

On the afternoon of August 27th both contact chambers were drained and cleaned to prevent any further discharge of excess solids. The TSS results for August 27th were once again within permit limits.

Please feel free to contact John Waite, Environmental Manager, 229-259-3592, jwaite@valdostacity.com with any questions concerning this event.

Sincerely

John L. Whitehead, III
chn L. Whitehead III

Deputy City Manager, Operations

jpw

Post Office Box 1125 • 1017 Myrtle Street • Valdosta, GA 31603-1125
Deputy City Manager Operations (229) 259-3585 • Fax (229) 259-3598 • jwhitehead@valdosfacity.com
An Equal Opportunity Employer

Henry Hicks
DIRECTOR OF UTILITIES

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, GA 30354

December 3, 2008

RE: Ma

Major Spill Report

Withlacoochee WPCP, NPDES Permit # GA0033235

Between Nov. 28-30, 2008, the Valdosta area received approximately 4 inches of rain, .5 inch on Friday, 3 inches and Saturday, and .5 inch on Sunday. Inflow and infiltration from the heavy rain entered the sanitary sewer system, causing high flows at both treatment plants.

There were two reportable separate sewage release incidents from the Withlacoochee Publicly Owned Treatment Works and associated sewer conveyance system:

The first spill resulted from the exceptionally high flows on Saturday, Nov. 29 at the Withlacoochee Water Pollution Control Plant. The high flow rate resulted in the washout of secondary clarifier blankets resulting in the bypass of the final filters causing high total suspended solids in the effluent of the facility. The effluent total suspended solids result for Nov. 29 was over 150% of the weekly average, which constitutes a "Major Spill" as defined in the facility's NPDES permit. The estimated volume of this spill was approximately 6.5 million gallons. Withlacoochee Treatment Plant staff has started the required upstream/downstream sampling of the receiving stream, the Withlacoochee River.

The second spill was the surcharge from an interceptor line manhole upstream of the Withlacoochee Facility, resulting in a discharged approximately 135,000 gallons of raw sewage onto the ground surrounding the manhole. It is unknown how much of the discharge may have reached the Withlacoochee River. The upstream/downstream monitoring for the plant major spill event will cover the sampling response for this spill as well.

The City of Valdosta and Camp Dresser & McKee (CDM) conducted a Sewer System Modeling and Capacity Evaluation during 2008. In November CDM presented the City with several scenarios for ongoing rehabilitation and capital



improvement projects to reduce inflow and infiltration. This report is currently being evaluated by city staff. In addition the City will use the flow information and pump run time information from the pump stations to locate areas of high inflow. These will be investigated to determine if any immediate repairs are possible to reduce inflow.

During this event one of the influent pumps at the Withlacoochee WPCP clogged with rags and debris. The City has contracted with Metcalf and Eddy to replace the barscreens at the influent station, install level monitoring, and make other improvements to the station. In addition the City will inspect the Withlacoochee Interceptor manholes from the plant to the start of the interceptor to determine if any debris may be entering the system through these manholes.

For more information, please contact the City's Environmental Manager John Waite at (229) 259-3592.

Sincerely,

Henry K. Hicks Utilities Director

jpw

Henry Hicks
DIRECTOR OF UTILITIES

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

January 28, 2009

RE: Major Spill Report

Mud Creek WPCP, NPDES Permit # GA0020222

Dear Mr. Noell,

On Tuesday, January 27, 2009, the Mud Creek WPCP began experiencing problems with the return activated sludge tubes on secondary clarifier #3. The tubes became clogged and return sludge could not be pulled from the tank. The plant staff tried to clear the clog all day Tuesday. The staff opened and closed the return controls on the clarifier attempting to change pressures in the tubes. They increased the pump speeds to pull more sludge from the clarifiers, attempted to clear the tubes with wash down hoses, and attempted to rod the tubes with plastic pipe. All attempts to clear the tubes were unsuccessful. On Wednesday morning the sludge blanket was high and return sludge still could not be removed. The blanket was experiencing clumping caused by denitrification of the sludge, and heavy solids were leaving the clarifier. The plant staff took the clarifier out of service at 7:00am Wednesday. The utilities department Vac Con truck dispatched the plant to help clear the drain lines, and the staff began draining the clarifier for inspection and repair.

Due to the high solids leaving clarifier #3 on Tuesday the plant effluent total suspended solids result from the composite sample was 97 mg/l. This is in excess of 1.5 times the average weekly limit of 45 mg/l. This discharge constitutes a "major spill" according to the Rules and Regulations for Water Quality Control Chapter 391-3-6, and per the Mud Creek WPCP NPDES permit. The quantity of the spill is the daily flow for the facility, 2.7 MG. Upstream/downstream sampling required by the rules and regulations will be started January 29, 2009.

The clarifier has been removed from service and is draining. When it is completely drained the staff will determine the cause of the loss of return sludge flow. Removal of the clarifier from the flow stream should relieve the loss of solids from the facility.



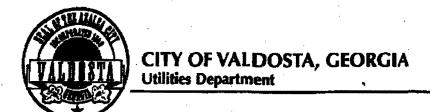
The Superintendent of the Mud Creek WPCP is currently updating the standard operating procedures for the facility. He will include procedures for keeping return flows at proper levels and for timely response to high solids discharge. The updated standard operating procedures and corresponding training should prevent this type of occurrence in the future.

If you have questions concerning this incident please contact John Waite, Environmental Manager at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry K. Hicks Utilities Director

jpw



Henry Hicks DIRECTOR OF UTILITIES

April 24, 2009

Mr. Bill Noell
Compliance and Enforcement Unit East
GA Environmental Protection Division
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

Dear Mr. Noell

Over the period of March 26<sup>th</sup> through March 28, 2009 the Valdosta area received approximately two inches of rainfall. Areas to the north of Valdosta received considerably more rainfall. The heavier rains to the north caused flooding of the Withlacoochee River. The following Thursday and Friday, April 2 and 3, 2009, the area received another ten inches of rainfall. The extra stormwater caused a rapid rise of flood waters and brought about the worst flooding of the Valdosta area to occur in the past sixty years. The flooding of the Withlacoochee River led to flooding of Sugar Creek and Two Mile Branch in the area where these streams converge and join the river. Houses along Park Lane, Meadowbrook Drive, Winding Way, and Lake Drive were flooded.

#### Withlacoochee River WPCP

The Withlacoochee River WPCP interceptor line, which carries the wastewater received at the Withlacoochee facility, is located in the affected area. Also in the area are the major trunk lines bringing wastewater to the interceptor. The flood water covering these lines combined with inflow and infiltration from heavy rains caused a hydraulic overload of the Withlacoochee WPCP on March 27<sup>th</sup>. The hydraulic overload caused short circuiting of the secondary clarifiers with a resulting loss of biomass. This led to a "major spill" as defined in the facility permit, the effluent total suspended solids being greater than 1.5 times the seven day maximum average



allowed. This City reported by telephone as required and the local media was notified. As the flood waters continued to rise the interceptor and trunk lines filled with flood water, bringing the flow at the facility to the maximum capability of the influent pumps, 25 MGD. At this high flow rate the facility was unable to maintain even secondary treatment.

Flood water from the Withlacoochee River entered the Withlacoochee River WPCP grounds from the north, surrounded the drying beds, and reached the dyke that had been constructed in response to floods in previous years. On April 3<sup>rd</sup> flood waters began to reach the top of the dyke and emergency action was necessary to prevent flooding of the influent pump station. Utilities department staff were joined by volunteers from other city departments and troops from Moody Air Force Base to fill and place sandbags along the top of the dyke. Flood water continued to rise during the night, and by early Saturday morning, April 4<sup>th</sup>, the sandbags placed the day before were nearly underwater. Once again City staff, troops from Moody Air Force Base, and prison details responded. Local construction firms supplied fill dirt, sand, and gravel along with heavy equipment to increase the height of the dyke. The water continued to rise during the night and on Sunday work continued to strengthen and increase the dyke. On Sunday approximately 120 college students volunteered for work. The river finally crested on the afternoon of Sunday, April 5<sup>th</sup>.

Flood water covered the chlorine contact chambers and the dual media backwash filters at the facility. The Chlorine Building was flooded and electrical power to the building had to be disconnected. The facility was not able to measure flow, disinfect, or sample. The effluent flume was under several feet of water, and the water being pumped through the plant was overflowing the tank walls, first at the dual media filters and eventually at the secondary clarifiers.

The flood water has now receded and Utilities Department staff have been cleaning and evaluating damage. Appendix one below contains information on effected processes, current status, and estimated recovery time.

#### Sanitary Sewer Overflows along Sugar Creek

Flooding of the Withlacoochee River, Sugar Creek and Two Mile Branch in the area where these three converge covered the 30" Sugar Creek bypass sewer, the 18" sewer serving areas between Baytree Road and Meadowbrook Drive, and the 24" sewer from the Three Mile Branch basin. With these lines full at the downstream end several manholes upstream suffered sanitary

overflows. Sanitary sewer overflows were noted at 1212 Wainwright Drive, just downstream of Sugar Creek Apartments at the south west corner of the closed Sugar Creek WPCP, at 2310 Park Lane, and at 2408 Meadowbrook Drive. The volume of wastewater spilled could not be determined. Several of the manholes were underwater during the event. The City began upstream/downstream sampling of One Mile Branch and Sugar Creek on April 4th.

Included with this report is the stream monitoring data for One Mile Branch/Sugar Creek, and the Withlacoochee River from April 4<sup>th</sup> through April 16<sup>th</sup>.

Sincerely,

Henry K. Hicks Utilities Director

## Appendix One Conditions at Withlacoochee WPCP Updated April 24, 2009

#### Influent Pump Station:

The Influent Pump Station was in danger of being completely flooded. Emergency crews and volunteers worked all weekend to raise the existing berm enough to prevent loss of the station. The wet well of the station was flooded from inflow into the interceptor line on March 27<sup>th</sup> and remained flooded until April 6th. The dry well portion flooded from seepage and groundwater infiltration to a depth of about ten feet. This covered the rotating portions of the influent pumps, which will most likely cause premature bearing failure. The pumps will be scheduled for rebuilding or replacement.

### Preliminary and Primary Treatment

The preliminary treatment and primary treatment systems did not suffer flood damage. During the high flow the primary clarifiers were bypassed to prevent loss of primary sludge to the secondary system.

## Roughing Towers:

The roughing tower system did not suffer flood damage.

#### Acration Basins/ Nitrification System:

The activated sludge system suffered a washout of mixed liquor suspended solids due to the extremely high flows. Plant staff isolated two of the aeration basins and used them to store biomass to use as seed for recovery. Using this stored sludge the plant staff was able to bring the secondary system back to operation quickly. On April 22<sup>nd</sup> the process had recovered sufficiently to begin daily sludge wasting.

**Dual Media Backwash Filters:** 

The dual media filters were completely covered by flood waters, only the traveling bridges were above water. The filters were bypassed and have remained bypassed to allow flow through the facility. Due to solids washout from the secondary system and sediment from flood waters the filter media was badly clogged. The filter carriages were started again on Monday, April 20<sup>th</sup> and have been backwashing since to remove as much of the accumulated solids as possible. On April 23<sup>rd</sup> the bypasses on two of the four filters were able to be closed during the hours of lower flow. Flooding did cause failure of the limit switches on the underside of the traveling bridges, and these are being repaired. One filter is still out of service for replacement of the overhead electrical cable.

#### Chlorination and De-Chlorination:

The Chlorine Building was flooded and suffered severe electrical component damage. Electricians began working as soon as they could access the building to dry conduit runs and replace components, including two transformers. During the flood the facility had no means of measuring accurate flows, sampling the effluent, or operating chlorination and de-chlorination. The chlorinators themselves were flooded and will be replaced. There was one wall mounted 500 pound per day chlorinator available as a backup that was connected to provide temporary chlorination. Disinfection and de-chlorination were resumed on Saturday, April 11<sup>th</sup>.

The City has ordered new chlorination and de-chlorination equipment. Installation of the new system should take place during the week of April 27<sup>th</sup>.

The effluent flow meter was replaced with a spare and another unit has been ordered. The effluent sampler was flooded and will have to be replaced. Until then the effluent flow proportional composite sample is being collected by hand.

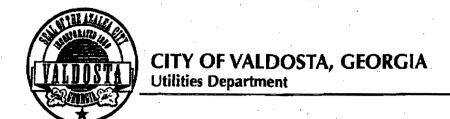
## Solids Handling:

The air compressor supplying compressed air to the Phoenix belt presses was flooded and is being replaced. This unit is scheduled to arrive on April 27<sup>th</sup>. Belt press motors had to be repaired and have been re-installed. At least one press should be available for service during the week of April 27<sup>th</sup>.

## Re-use Water System:

The motors for the low pressure re-use water pumps had to be sent out for repair. This work is complete and the low pressure re-use system is operational.

It is important to note that while damaged systems are being slowly brought back online, they are operating under seriously deteriorated conditions and could fail at any time. Many components for these systems are still being evaluated for their long term operability which will probably require replacement of whole systems before planned due to age, spare part availability, ongoing reliability concerns and other factors associated with their long term submersion under the flood waters.



Henry Hicks

April 1, 2009

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Mr. Noell,

Over the forty eight hour period from March 26th to March 28th the Valdosta area and areas to the north of Valdosta received heavy rain. This rain caused the Withlacoochee River and Little River to rise above flood stage. River flooding covered the Withlacoochee WPCP interceptor and caused Sugar Creek, a tributary to the Withlacoochee River, to rise to flood level. On March 31st the Valdosta area received another 2.5 to 3" of rain. Increased flooding from this rain covered the manholes along Sugar Creek leading to the Withlacoochee interceptor. Stormwater inflow combined with flood waters caused the interceptor to surcharge and caused a hydraulic overload at the Withlacoochee River WPCP. In the early morning hours of April 1st the effluent flow peaked at a rate of 16.5 MGD.

Due to the hydraulic overload the secondary clarifiers suffered hydraulic short circuiting with a resultant loss of solids. The total suspended solids result from the effluent composite sample for March 31st was 214 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit, constituting a major spill. The Environmental Protection Division was notified as soon as laboratory results confirmed the spill. All reporting and sampling requirements will be followed. The volume of the major spill will be the average daily flow for the facility; 8.8 MG.



The City of Valdosta is continuing to work with Camp, Dresser and McKee (CDM) to plan for the systematic reduction of inflow and infiltration through maintenance, repair, and capital improvement projects.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry K. Hick Utilities Director

jpw



## **Press Release**



### For more information, contact:

Sementha Mathews. Public Information Officer

Phone: (229) 259-3548

E-mail: smathews@valdostacitv.com

For Immediate Release April 7, 2009

Release #04-09-17

## **Public Notice**

Update on Withlacoochee Spill

Between March 26 and April 3, 2009 the City of Valdosta and surrounding areas received heavy rains with accumulations of up to 11 inches. The high accumulation caused extreme flooding of the Withlacoochee River, Little River, Sugar Creek, and other area creeks and streams. Flood waters from the Withlacoochee River and Sugar Creek entered the sanitary wastewater collection system, overwhelming the system and causing the release of wastewater through overflowing manholes. Sanitary sewer overflows were noted on Park Lane and Meadowbrook Drive on Friday, April 3. These manholes have been completely covered by flood waters. Additional sanitary overflows were located in the area of One Mile Branch west of Gornto Street. Due to flooding it is impossible for the City to determine the number of sanitary overflows or the total volume of wastewater released.

Flooding of the wastewater collection system caused extremely high flows at the Withlacoochee River Water Pollution Control Plant. The facility suffered a hydraulic overload and discharged high levels of total suspended solids on April 1 and April 2. Emergency dike construction and sandbagging efforts continued throughout the weekend at the facility to prevent a catastrophic loss. On Friday, April 3, the chlorine contact chamber and chlorine building were flooded. Since that time it has not been possible to measure flow, disinfect, or collect effluent samples. The City is making plans for the recovery of the treatment process and restoration of disinfection, sampling, and flow measurement as soon as receding flood waters allow.

Flooding in the area of Plantation Drive covered the Country Club Pump Station. Due to flood waters encroaching on the electrical panel it was necessary for the City to disconnect electrical power to the station. The volume of wastewater released cannot be determined. The Utilities Department restored this station to limited service late Monday afternoon and expects to have it at full capacity by early Wednesday.

The City is monitoring levels of fecal coliform bacteria in the Withlacoochee River and Sugar Creek and will continue to do so in accordance with State law. The public is asked to avoid all contact with flood water since it may contain high bacteria levels.



## PRESS RELEASE



For more information, contact:

Sementha Mathews, Public Information Officer

Phone: (229) 259-3548

E-mail: smathews@valdostacity.com

### FOR IMMEDIATE RELEASE:

April 2, 2009

Release #: 04-09-04

## **Public Notice of Wastewater Spill**

City Reports Waste Spill at Withlacoochee WPCP

The City of Valdosta has reported a wastewater spill for Tuesday, March 31, 2009, at the Withlacochee River Water Pollution Control Plant per state requirements.

Flooding of the Withlacoochee River coupled with ongoing heavy rains has caused both river and storm water inflow and infiltration into the sewer collection system going to this plant. The resultant combined wastewater and storm water flows entering the facility have exceeded the facility's peak treatment capacity of 12.0 million gallons per day. Those incoming flows have and continue to exceed 16.0 million gallons per day resulting in a hydraulic overload at the facility causing the discharge of solids from the facility's secondary clarifiers to enter the effluent discharge into the river.

The plant effluent total suspended solids analysis from the composite 24-hour sample for March 31 was 214 mg/l. This is in excess of 1.5 times the average weekly limit of 45 mg/l and constitutes a "major spill" according to the Rules and Regulations for Water Quality Control Chapter 391-3-6 and the Withlacoochee River Water Pollution Control Plant NPDES permit. The quantity of the spill for this date is estimated to be 8.8 MG.

Facility personnel have begun mandatory upstream/downstream sampling from the discharge point as required by the rules and regulations. For more information, contact the City's Environmental Manager John Waite at (229) 259-3592.

## **John Waite**

From:

John Waite

Sent:

Monday, August 31, 2009 8:19 AM

To: Subject: bill\_noeli@dnr.state.ga.us Spill to Waters of the State

Attachments:

dampier street spill report to bill noell 8\_27\_09.doc

## Mr. Noell,

Here is a electronic copy of the report for the August 26, 2009 spill to Dukes Bay Canal in Valdosta. The original will be mailed today.

John P. Waite

City of Valdosta-Utilities Department

407 E. Alden Ave.

P.O. Box 1125

Valdosta, GA 31603

P: 229-259-3592

F: 229-333-1899

Email: jwaite@valdostacity.com Website: www.valdostacity.com Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

August 27, 2009

RE: Spill Report, Mud Creek POTW, NPDES Permit # GA0020222

Dear Mr. Noell,

At approximately 1 a.m. on Wednesday, Aug. 26, 2009, Utility Department personnel found a manhole overflowing in the vicinity of 210 Dampier Street, Valdosta, Georgia. Utility Department personnel responded immediately to identify and correct the problem. The spill was stopped by 3:30 a.m.

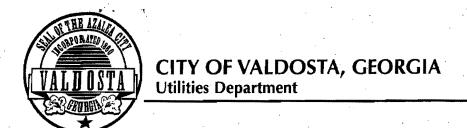
This spill was caused by grease accumulation from surrounding businesses and residences within the sewer line in the Dampier Street area. Wastewater entered Dukes Bay Canal at the Dampier Street bridge. An estimated volume of 3000 gallons of wastewater entered the waterway.

The City will undertake a survey of the area served by the Dampier Street sewer main to identify possible industrial and commercial sources of grease and to ensure that these sources are in compliance with the Municipal Utilities Ordinance. Also, the City has a targeted public information program that provides information on the proper disposal of residential cooking grease through distribution of door hangers. The residential neighborhood served by the Dampier Street sewer main will be provided with door hangers.

Please direct any questions regarding this spill to John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks Utilities Director



Henry Hicks
DIRECTOR OF UTILITIES

November 11, 2009

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Mr. Noell,

On November 11, 2009 a sewer crew involved in inspection of the collection system located a sanitary sewer overflow at 1825 Norman Drive, Valdosta, GA. The City has determined that the cause of the overflow was a blockage of grease and rags. A vacuum truck was dispatched to the scene and cleared the blockage, stopping the overflow. The sanitary overflow was stopped at 8:20 am, a duration of one hour. An estimated 14,000 gallons of raw wastewater was released.

Wastewater from this overflow did reach the Waters of the State; Sugar Creek in the vicinity of 1825 Norman Drive. The City will begin the required stream sampling this afternoon.

The Utilities Department is working to update the Sewer Use Ordinance to implement an effective FOG (fats, oils and grease) Reduction Program for the City of Valdosta. The target date for implementation of this program is March 2010.

If you have any questions concerning this overflow or this report, please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Sincerely, Herry Suly

Henry Hicks, Utilities Director



Henry Hicks
DIRECTOR OF UTILITIES

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

December 2, 2009

RE: Spill Report, Withlacoochee POTW, GA 0033235

Dear Mr. Noell.

On December 2, 2009 the City of Valdosta experienced two sanitary sewer overflows from the collection system.

The first overflow occurred this morning at approximately 9:00 am in the vicinity of 1825 Norman Drive. The overflow was caused by a blockage in a ten inch diameter sewer line. The blockage was the result of grease and rags accumulating in the sewer. Approximately 6,000 gallons of raw wastewater overflowed, some of which entered the Waters of the State, specifically Sugar Creek. The blockage was cleared and the overflow stopped at 11:00 am.

The second overflow also occurred this morning at approximately 9:00 am. This overflow was also the result of a grease blockage in a sewer main. Approximately 9,000 gallons of raw wastewater overflowed from the collection system and entered a storm drain in the vicinity of 2408 North Patterson St. This storm drain empties into the Waters of the State, specifically Two Mile Branch. The blockage was cleared and the overflow stopped at approximately 12:00 pm.

The Utilities Department is currently working on an update of the Sewer Use Ordinance to implement an effective FOG (Fats, Oils, and Grease) Reduction Program for the City of Valdosta. The target date for implementation of this program is March 2010.

Please direct any questions regarding this spill to John Waite, Environmental Manager, at 229-259-3592 or iwaite@valdostacity.com

Sincerely,

Utilities Director

enue 1125



## CITY OF VALDOSTA, GEORGIA Utilities Department

Henry Hicks
DIRECTOR OF UTILITIES

December 22, 2009

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Mr. Noell,

On December 22, 2009 a sewer crew involved in inspection of the collection system located a sanitary sewer overflow at 1825 Norman Drive, Valdosta, GA. The City has determined that the cause of the overflow was a blockage of grease and rags. A vacuum truck was dispatched to the scene and cleared the blockage, stopping the overflow. The sanitary overflow was stopped at approximately 3:00 pm, approximately one hour after discovery. An estimated 14,000 gallons of raw wastewater was released.

Wastewater from this overflow did reach the Waters of the State; Sugar Creek in the vicinity of 1825 Norman Drive. The City will begin the required upstream/downstream sampling this morning.

The Utilities Department is working to update the Sewer Use Ordinance to implement an effective FOG (fats, oils and grease) Reduction Program for the City of Valdosta. The target date for implementation of this program is March 2010.

If you have any questions concerning this overflow or this report, please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Jason Scarpate,

Assistant Utilities Director





## CITY OF VALDOSTA, GEORGIA

**Utilities Department** 

Henry Hicks
DIRECTOR OF UTILITIES

December 14, 2009

Mr. Bill Noell
Unit Coordinator
Environmental Protection Division, Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Mud Creek Damage Report, Report of Major Spill

On Monday, December 7, 2009, operators at the City of Valdosta's Mud Creek Wastewater Treatment Facility discovered a collapsed manhole just prior to the main influent pump station for the plant. The collapsed manhole receives all sewage feeding the Mud Creek facility through one 21-inch and one 24-inch sewer main and feeds the main pump station through a 30-inch line. All three of these feed lines were significantly damaged as a result of the manhole collapse. Sewage flowing through these lines was contained in the hole surrounding the collapsed manhole and continued to enter the main wet well of the receiving pump station where it continued to be pumped to the facility's headworks's structure and treatment processes. City staff immediately contacted a local underground contractor to begin emergency repairs due to the scope of damage and equipment necessary to make repairs. Two temporary 6-inch pump around systems were set up to pump directly to the main pump station wet well, one each in manholes upstream for the 21-inch and 24-inch lines while equipment to make repairs of the collapsed manhole area was mobilized to the site. By Monday evening the pump around systems were fully functional but downstream lines were unable to be plugged due to high flows coming into the plant.

On Tuesday, December 8, 2009, excavation of the collapsed manhole area had begun and replacement manholes now numbering three due to their level of deterioration as well as associated piping materials were ordered. By Tuesday evening, excavation was substantially complete, but stopped until the downstream lines of both pump around systems could be plugged and the wet well cleaned and dewatered sufficiently to plug it's 30-inch entry line into the wet well. It is important to note that through this period, all wastewater remained contained on site and none entered any water's of the state, nor were any surcharges discovered in the associated collection system coming to this facility.

On Wednesday, December 9, 2009, equipment was brought in to removes an extensive amount of grease, rags and other debris from the wet well prior to an attempt to plug it's 30-inch line which was allowing flow from the wet well back into the excavated pit area around the manhole collapse. A little after noontime rain began to fall again and one of the two functioning wet well pumps become clogged with debris and would no longer pump influent to the headworks. The third available pump was not functioning due to a short in it's control wiring which was being repaired to by a contracted electrician. Prior to an attempt to start this third pump it's motor was



tested and found to be shorted. It was then removed and sent out to a motor repair shop for inspection and repair. Plant staff worked to unclog the one pump, thus leaving a single pump to deliver influent to the headworks. As a result, the wet well level began to rise but remained contained within the excavated pit area. The planned attempt to plug the 30-inch line was postponed until the next day. The first of three manholes and associated piping was delivered to the site. By early evening a steady rain was falling and staff noticed that the first upstream manhole from the plugged 21-inch line started to surcharge slightly and the plug on this line was removed, but pump around system remained functioning. This stopped any surcharge from leaving the area immediately around the manhole. Overnight the plant encountered heavy rains and no further surcharges were encountered on site. The plan would be to plug the 30-inch wet well influent line in the morning of Thursday.

On Thursday, December 10, 2009, morning ongoing heavy rains dictated that the morning's attempt to plug the 30-inch line be postponed until the repaired motor was delivered and installed with a delivery time of 11:00 AM that morning. The clogged pump was continuing to be cleaned and prepared for startup once the third pump was installed and ready. At approximately 1:30 PM, the department's Environmental Manager reported that he had discovered a series of manholes upstream of the Mud Creek Plant serving the bypassed 21-inch main to that plant which had surcharges the previous evening. He estimated that approximately 500,000 gallons of sewage spilled and entered the waters of the state. This was reported to EPD and the Health Department. The repaired motor was reinstalled and tested by 5:00 PM and all three pumps in the main pump station were started in order to dewater the wet well so the 30-inch plug could be installed and repairs to the damaged manholes could proceed. The bypass pumps were turned off to stop flows into the wet well in order to speed up this process. We anticipate that as a result of shutting down the bypass pump systems that more sewer surcharges would occur within the sewer collection system feeding the plant until the plug could be installed and bypass pump systems restarted. Due to the significant amount of mud in the wet well the dewatering process was not completed until approximately 8:30 PM, the plug was installed and bypass pump systems restarted. At 9:30 PM both newly installed pumps failed leaving a single pump to handle flow. As a result, both pump around systems were periodically shut off during the evening to avoid overflow the wet well. This action probably caused additional surcharges from the collection system flowing to the Mud Creek Facility.

On Friday, December 11, 2009, repairs on one of the manholes were begun by the contractor. We estimate that repairs of the three affected manholes and associated piping will be completed by December 18<sup>th</sup> weather permitting. Both pump around systems are being intermittently shut down avoid overflowing wet well into the excavated areas for manhole replacement and piping repairs. Another contractor was contacted to bring in necessary pumps, piping and associated equipment to do bypass pumping directly to the headworks in order to allow replacement of manholes and piping work to proceed quickly. Only one of the two damaged pumps will be removed for repairs because of a nonfunctional isolation valve on the other pump. Once bypass

pumping to the headworks is underway, the remaining failed pump will be removed for repair as well. Upon completion of all necessary repairs and flushing of affected force mains, the plant will be returned to normal pumping operation. A press release and formal Public Notice was issued. Signs were posted in affected areas and upstream and downstream sampling started. Mary Sheffield of EPD visited the site Friday afternoon.

Early Saturday morning, December 12, 2009, one of the pumps used for pump around failed and was replaced with a spare pump on site. The bypass pump system contractor arrived on site at 8:00 AM and began work on installing two 12-inch bypass systems along with associated piping to the facility's headworks structure. Heavy rains prevented the underground contractor from undergoing any additional repair work on the manholes and associated piping to the plant influent pump station. Pump around systems continued to function without further problems.

On Sunday, December 13, 2009, both bypass pump systems and piping to the headworks were installed and fully functional at 5:00 PM. Heavy rains continue. Flows measured at the plant were approximately 3.5 MGD due to ongoing rain. Rain is expected to continue until Wednesday morning.

Until all repairs are made, bypass pump system will be operated around the clock to minimize potential surcharges from the sewer collection system feeding the Mud Creek Facility.

Below are our estimated sewer surcharge totals for this period are as follows:

Date	Recorded Flow	Estimated loss
12/8/09	3.0 MG	0.55 MG
12/9/09	2.4 MG	1.15 MG
12/10/09	2.4 MG	1.15 MG
12/11/09	2.2 MG	1.35 MG
12/12/09	2.6 MG	0.95 MG
12/13/09	3.2 MG	0.35 MG

The estimated total spilled is 5.5 MG.

If you require any additional information, please contact us.

Sincerely

John P. Waite

Environmental Manager



: 7519301-884

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9 4:21

4:21

: FEB

FEB

: ECM

: 40sec

## TRANSMISSION REPORT

(TUE) FEB 8 2010 4:22

**DOCUMENT#** 

TX START

**DURATION** 

COM. HODE

TIME STORED

User /Account

DESTINATION

: 14043822891

DEST. NUMBER

: 14043822891

F-CODE

**PAGES** 

: 4page

RESULT

: OK



Water, Sewer & Drainage

Fax

Fax: 404-362-2691 Dates

Phone:

## City of Valdosta Department of Utilities Report of Sanitary Sewer Overflow or Sewage Spill

Type of Occurrence: Major Spill

Date: February 5, 2010

Time Started or identified: 2/5/2010

Time Stopped: 2/6/2010

Location: Withlacoochee River WPCP 3352 Wetherington Lane

Amount: 12 million gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Withlacoochee River

Cause: Inflow from heavy rain

Corrective Action: collection system rehabilitation program

Upstream sampling site will be: Withlacoochee River at Highway 133

Downstream sampling site will be: Withlacoochee River at Highway 84

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Comments: Laboratory results from the Withlacoochee WPCP, 3352 Wetherington Lane, Valdosta indicate that the facility suffered a washout of solids due to excessively high flow caused by inflow from the rain event. The total suspended solids released from the facility on February 5, 2010 were in excess of 1.5 times the allowed weekly average. This constitutes a major spill as defined in the facility permit. The volume of the major spill is 12 million gallons, which is the reported flow through the facility for February 5, 2010. The facility discharges to the Withlacoochee River.

7519301-023

: MAR 13

: 18sec : ECM

0:28

## TRANSMISSION REPORT

(SAT) MAR 13 2010 0:29

**DOCUMENT#** 

TX START

DURATION

COM. MODE

TIME STORED

User/Account

DESTINATION

: 14043622691

DEST, NUMBER : 14043622691

F-CODE

: 1page PAGES : OK RESULT

> City of Valdosta Department of Utilities Report of Sanitary Sewer Overflow or Sewage Spill

Type of Occurrence: Major Spill

Date: March 11, 2010

Time Started or identified: March 12, 2010 laboratory result

Time Stopped: March 12, 2010

Location: Withlacoochee River WPCP

Amount: 12.2 Million Gallons

Did spill reach "Waters of the State"? Yes

## City of Valdosta Department of Utilities Report of Sanitary Sewer Overflow or Sewage Spill

Type of Occurrence: Major Spill

Date: March 11, 2010

Time Started or identified: March 12, 2010 laboratory result

Time Stopped: March 12, 2010

Location: Withlacoochee River WPCP

Amount: 12.2 Million Gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Withlacoochee River

Cause: Inflow from heavy rain

Corrective Action: collection system rehabilitation program

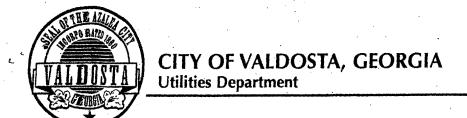
Upstream sampling site will be: Withlacoochee River at Highway 133

Downstream sampling site will be: Withlacoochee River at Highway 84

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Comments: Inflow and infiltration from heavy rain caused a hydraulic overload at the Withlacoochee River WPCP, resulting in a loss of solids from the secondary treatment system. This caused the effluent total suspended solids to be in excess of 1.5 times the maximum seven day average, constituting a "major spill" as defined in the NPDES permit.



Henry Hicks
DIRECTOR OF UTILITIES

April 14, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Sanitary Sewer Overflow 2408 N. Patterson Street, Valdosta, GA

Dear Mr. Noell,

On Sunday, April 4, 2010, the City of Valdosta sanitary sewer collection system experienced a sanitary sewer overflow between approximately 7:30 and 9:17 p.m. Staff responded and found a blockage in an eight-inch sewer line crossing at 2408 N. Patterson Street, later determined by staff to have been caused by a blockage of grease and rags. The overflow site has been inspected and cleaned.

Approximately 4,000 gallons of wastewater entered the Waters of the State at Two Mile Branch through a stormwater outfall at a rate of approximately 37 gallons per minute for 107 minutes. Since this overflow is not considered a major spill, no sampling upstream or downstream is required.

In January 2010, the Utility Department finalized its Sanitary Sewer System Assessment and Capacity Analysis Report with recommendations for a long-term rehabilitation program of the sewer collection, pumping and treatment systems. The Utility Department will utilize this to plan to prioritize repairs, rehabilitation and upgrades to the entire sanitary sewer system over the next 20 to 30 years. In addition, the Utility Department will be introducing a Fats, Oils, and Grease (FOG) Prevention Ordinance in April to reduce and potentially eliminate sewer spills related to fats, oils and grease blockages in the sanitary sewer system.



Investigations of manholes upstream of the overflow conducted on April 5<sup>th</sup> and April 7<sup>th</sup> indicate that the grease and rags most likely originated from South Georgia Medical Center. The City has contacted South Georgia Medical Center to begin a program aimed at the reduction of grease and rags being discharged to the POTW.

If you have any questions concerning this overflow or this report, please contact John Waite, Environmental Manager, at (229) 259-3592 or at <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>.

Sincerely

Henry Hicks

**Utilities Director** 

April 20, 2010

Mr. Bill Noell
Unit Coordinator
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

Dear Sir.

Per your request, below is a summary of sewer system capital related projects the City of Valdosta expects to complete in this year's budget (ending June 30, 2010) and the projects planned in the following budget year (starting July 1, 2010 through June 30, 2011) as well as other necessary actions required to complete associated work over the coming years. This list does not include critical projects related to the water system.

#### Current Budget

- Ponderosa and Big Country Club Lift Station Replacements designs are complete and the existing home on the Ponderosa property is expected to be demolished before the end of April. CDM is finalizing designs on two additional lift stations (Mack Drive and Eastwinds) so we can advertise for bid multiple lift stations at once. Dependent on bid pricing received for this work, we expect to issue a Notice to Proceed on at least Ponderosa and Big Country Club before June 30, 2010 and may be able to start work on additional stations under the current budget, carrying funds forward into the next fiscal year. We have approximately \$1,000,000 remaining in our budget for this work as well as \$500,000 in GEFA funding available.
- Valdosta mall sewer interceptor rehabilitation we will be advertising for bids
  once final design is completed for a new lift station and force main to replace this
  interceptor. We expect design and bid documents will be completed by June 30,
  2010. We have approximately \$350,000 in GEFA funding available for this
  work.
- Sewer system condition assessment a RFP will be advertised for cleaning, CCTV and/or other technology evaluation methods to assess the condition of the sewer system and determine appropriate rehabilitation techniques starting with major interceptors. We have approximately \$350,000 in funding available for this work.



- Mud Creek Wastewater Plant Expansion Work has started and will be completed in late 2011. This project is funded through GEFA (CWSRF) and ARRA at \$45,000,000.
- Implementation of SCADA in all lift stations Currently have \$400,000 in budget. We have received information on the recommended radio technology for use at each station and plan to advertise for bid in June 2010.
- CMMS computerized maintenance management system for use throughout all department divisions and is being implemented as part of the Mud Creek Expansion Contract with implementation by June 2010.
- FOG Prevention Ordinance Should be adopted by end of May 2010.

#### Proposed Budget for FY11

- Rate Study at \$150,000.
- Design and construction of a new force main, pump station and equalization basin
  to the Withlachoochee Wastewater Plant at an estimated cost of \$30,000,000. This
  project is not funded as yet and we will be applying for funding through the next
  round of GEFA Loans. \$3,200,000 is proposed for the design, easement
  purchases, etc. in the budget if funding is approved. An RFP is currently being
  advertised for selection of a consultant to design this work.
- Sewer system condition assessment for rehabilitation \$600,000 is budgeted for assessment of sewer system, starting with major interceptors and trunk lines.
   Funding is through SPLOST.
- Mud Creek and Withlachoochee sewer system rehabilitation \$2,375,000 is budgeted for this work using SPLOST Funds. Additional funds for more work will also be requested under the next round of CWSRF funding.
- Replacement of ten lift stations Estimated cost is \$2,000,000. This project is
  not yet fully funded. Requests for funding have been submitted for special
  appropriation and a request for GEFA funding will be submitted under next round
  of CWSRF. The City currently has \$500,000 under existing GEFA Loan.
- Withlachoochee Wastewater Plant Upgrades \$1,250,000 is budgeted using SPLOST funds. This work is currently on hold until a final resolution from FEMA is received on mitigation plan resulting from severe flooding of this facility last spring. An RFP will be advertised to develop a proposed scope and plan for this work under this budget.

Again this summary does not include capital projects planned for the water system. If you have any questions please call me at your convenience.

In addition, as you are aware we met with your staff on Wednesday April 21, 2010 to review this plan and discuss any additional details or information you might need.

Respectfully,

Henry Hicks Utility Director

City of Valdosta

April 23, 2010

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Mr. Noell,

On April 22, 2010 the Withlacoochee River WPCP suffered a biological upset of the secondary treatment system which resulted in the loss of sludge blankets from the secondary clarifiers. The total suspended solids result from the effluent composite sample for April 22, 2010 was 144 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit, constituting a major spill. The volume of the major spill is 5.9 million gallons, which was the twenty four hour flow total.

The biological upset may have been caused by a chemical waste hauler discharging at the Withlacoochee Plant. The hauling company has been informed that further deliveries will not be accepted until a full determination of the cause of the upset has been made.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to Carolyn Hill after the first seven days of monitoring. All other requirements of 391-3-6-.05 are being followed.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Selection of the Solid Streets of the S

Henry Hicks
Utilities Director



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Time Started or identified: April 23, 2010 labor
Time Stopped: April 23, 2010 at 7:00 am
Location: Withlacoochee WPCP, 3352 Wetheri
Amount: 5.9 MG
Did spill reach "Waters of the State"? Yes
Receiving water: Withlacoochee River
Cause: biological upset of secondary treatment
Corrective Action: temporary stoppage of receivinvestigation of cause
Upstream sampling site will be: Withlacoochee
Downstream sampling site will be: Withlacoochee

Type of Occurrence: Major Spill

Date: April 22, 2010

Downstream sampling site will be: Withlacoocl Reported by: John P. Waite, Environmental Ma Contact Number 229-259-3592

Comments: On April 22, 2010 the Withlacooch upset of the secondary treatment system which r from the secondary clarifiers. The total suspend composite sample for April 22, 2010 was 144 m seven day maximum allowed by permit, constit major spill is 5.9 million gallons, which was the biological upset may have been caused by a chel Withlacoochee Plant. The hauling company has not be accepted until a full determination of the

Type of Occurrence: Major Spill

Date: April 22, 2010

Time Started or identified: April 23, 2010 laboratory results

Time Stopped: April 23, 2010 at 7:00 am

Location: Withlacoochee WPCP, 3352 Wetherington Lane

Amount: 5.9 MG

Did spill reach "Waters of the State"? Yes

Receiving water: Withlacoochee River

Cause: biological upset of secondary treatment system

Corrective Action: temporary stoppage of receipt of trucked wastes pending outcome of

investigation of cause

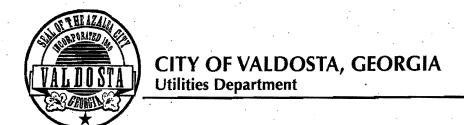
Upstream sampling site will be: Withlacoochee River at Hwy 133 crossing

Downstream sampling site will be: Withlacoochee River at Hwy 84 crossing

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Comments: On April 22, 2010 the Withlacoochee River WPCP suffered a biological upset of the secondary treatment system which resulted in the loss of sludge blankets from the secondary clarifiers. The total suspended solids result from the effluent composite sample for April 22, 2010 was 144 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit, constituting a major spill. The volume of the major spill is 5.9 million gallons, which was the twenty four hour flow total. The biological upset may have been caused by a chemical waste hauler discharging at the Withlacoochee Plant. The hauling company has been informed that further deliveries will not be accepted until a full determination of the cause of the upset has been made.



May 3, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Sanitary Sewer Overflow Tucker Road

Dear Mr. Noell,

On Thursday, April 29, 2010, the City of Valdosta sanitary sewer collection system experienced a sanitary sewer overflow between approximately 11:30 am and 12:30 pm. Staff responded and found a blockage in an eight-inch sewer line approximately 430 feet northeast of the intersection of Tucker Road and Tucker Lane. A vacuum truck was dispatched and the blockage cleared at approximately 12:30 pm. The overflow site has been inspected and cleaned.

Approximately 3,000 gallons of wastewater entered the Waters of the State, specifically Dukes Bay Canal, at a rate of approximately 50 gallons per minute for 60 minutes. Since this overflow is not considered a major spill, no sampling upstream or downstream is required.

The cause of this blockage has not yet been determined. The City will inspect this line using CCTV to identify any problems within the line that may have caused this overflow.

If you have any questions concerning this overflow or this report, please contact John Waite, Environmental Manager, at (229) 259-3592 or at <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>.

Sincerely

Henry Hicks Utilities Director



Type of Occurrence: Sanitary Sewer Overflow

Date: April 29, 2010

Time Started or identified: 11:30 am

Time Stopped: 12:30 pm

Location: Tucker Road, 430 feet NE of Tucker Lane

Amount: 3,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Dukes Bay Canal

Cause: line blockage

Corrective Action: line was cleaned and blockage cleared

Upstream sampling site will be: sampling is not required

Downstream sampling site will be: sampling is not required

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Comments: At approximately 11:30am on April 29, 2010 utility department staff became aware of a sanitary sewer overflow from a manhole on Tucker Road, approximately 430 feet northeast of Tucker Lane. The overflow was caused by the blockage of an 8" sewer line. Utility department staff responded, cleared the blockage, and jet cleaned the line. The overflow resulted in the discharge of approximately 3,000 gallons of raw sewage, some of which entered Dukes Bay Canal just south of Tucker Road. The cause of the blockage has not been determined at this time. Questions concerning this overflow may be directed to John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com



#### CITY OF VALDOSTA, GEORGIA

**Utilities Department** 

7, 2010

Henry Hicks
DIRECTOR OF UTILITIES

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Sanitary Sewer Spill 613 S. Patterson Street, Valdosta, GA

Dear Mr. Noell,

At approximately 9:00 am on Monday, June 14, 2010 City of Valdosta Utility Department staff discovered wastewater leaking into a stormwater drainage ditch in the vicinity of 613 South Patterson Street. The leak was caused by a broken wastewater collection pipe. The broken pipe was excavated and repaired; repairs were complete by 3:00 p.m.

Approximately 3,240 gallons of untreated wastewater were discharged to Dukes Bay Canal at South Patterson Street.

In January 2010, the Utility Department finalized its Sanitary Sewer System Assessment and Capacity Analysis Report with recommendations for a long-term rehabilitation program of the sewer collection, pumping and treatment systems. The Utility Department will utilize this to plan to prioritize repairs, rehabilitation and upgrades to the entire sanitary sewer system over the next 20 to 30 years.

If you have any questions concerning this overflow or this report, please contact John Waite, Environmental Manager, at (229) 259-3592 or at <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>.

Sincerely Siells

Henry Hocks Utilities Director

Type of Occurrence: Sewage Spill

Date: June 14, 2010

Time Started or identified: 9:00 am

Time Stopped: 3:00 pm

Location: 613 South Patterson Street, Valdosta, GA 31601

Amount: 3,240 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Dukes Bay Canal

Cause: Broken 10" pipe

Corrective Action: pipe repaired June 14, 2010 at 3:00 pm

Upstream sampling site will be: N/A

Downstream sampling site will be: N/A

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Comments: City staff found sewage entering a storm drainage ditch from the bank of the swale near a manhole. Excavation revealed a broken 10" pipe. Repairs were made by 3:00 pm.



#### Water, Sewer & Drainage

# Fax

To: Carolyn Hil	From John Wa	ite
Fax: 404-362-26		
Phone:	Pagesi 2 includio	ng Cover
Re:	CCı	<i>,</i>
□ Urgent □ For Review	☐ Please Comment ☐ Please Reply	□ Please Recycle
•Comments;		
Spill report		

Type of Occurrence: Sanitary Sewer Overflow

Date: September 27, 2010

Time Started or identified: 9:00 am

Time Stopped: 11:00 am

Location: 212 East College Street, Valdosta, GA 31601

Amount: 1,100 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: One Mile Branch

Cause: Inflow and Infiltration

Corrective Action: no corrective action was required

Upstream sampling site will be: sampling is not required

Downstream sampling site will be: sampling is not required

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Comments: Heavy rainfall in Valdosta during the night and morning resulted in stormwater entering the sanitary sewer collection system. The eight inch sewer on Williams Street was filled and overflowed through a pick hole in the manhole cover at the corner of Williams Street and College Street for approximately two hours. The amount of wastewater discharged is estimated to be 1,100 gallons. The wastewater entered the storm drainage system and was discharged to One Mile Branch at the Williams Street crossing. Questions concerning this overflow may be directed to John Waite, Environmental Manager, at 229-259-3592 or <a href="www.wastewater.com">www.wastewater.com</a>

October 4, 2010

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE:

Report of Spill

Dear Mr. Noell,

On September 27, 2010 the City of Valdosta received heavy rainfall during the night and morning that resulted in stormwater entering the sanitary sewer collection system. The eight inch sewer on Williams Street was filled and overflowed through a pick hole in the manhole cover at the corner of Williams Street and College Street for approximately two hours. The amount of wastewater discharged is estimated to be 1,100 gallons. The wastewater entered the storm drainage system and was discharged to One Mile Branch at the Williams Street crossing.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks Utilities Director

ipw





#### Water, Sewer & Drainage

# Fax

To: Carolyn H	511	From: John W	laite
Fax: 404- 362 Phone:		Date: Septemb	er 30,2010 eding cover
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Re:		CC:	J
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Type of Occurrence: Sanitary Sewer Overflow

Date: September 29, 2010

Time Started or identified: September 29, 2010 1730 hours

Time Stopped: September 29, 2010 2130 hours

Location: 212 East College Street (intersection of College and Williams)

Amount: 6,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: One Mile Branch

Cause: Inflow and Infiltration due to rain over 4"

Corrective Action: spill area is clean

Upstream sampling site will be: sampling is not required

Downstream sampling site will be: sampling is not required

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Type of Occurrence: Major Spill

Date: September 29, 2010

Time Started or identified: start time unknown, identified by water and debris

surrounding manhole on the morning of September 30th

Time Stopped:

Location: 1423 Gornto Road, Valdosta, GA

Amount: estimated 75,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Sugar Creek

Cause: Inflow and Infiltration due to rain over 4"

Corrective Action: area will be cleaned and lime applied

Upstream sampling site will be: Sugar Creek at 1404 Gornto Road

Downstream sampling site will be: Withlacoochee River at Hwy 133 crossing

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Type of Occurrence: Major Spill

Date: September 29, 2010

Time Started or identified: September 29, 2010 1730 hours

Time Stopped: September 29 2010, 2130 hours

Location: 2422 Meadowbrook Drive, Valdosta, GA

Amount: 48,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Two Mile Branch

Cause: Inflow and Infiltration due to rain over 4"

Corrective Action: area will be cleaned and lime applied

Upstream sampling site will be: 2520 Jerry Jones Road

Downstream sampling site will be: 1423 Gornto Road

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Type of Occurrence: Major Spill

Date: September 29, 2010

Time Started or identified: September 29, 2010 1730 hours

Time Stopped: September 29 2010, 2130 hours

Location: 2408 Meadowbrook Drive, Valdosta, GA

Amount: 48,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Sugar Creek

Cause: Inflow and Infiltration due to rain over 4"

Corrective Action: area will be cleaned and lime applied

Upstream sampling site will be: Sugar Creek at 1404 Gornto Road

Downstream sampling site will be: Withlacoochee River at Hwy 133 crossing

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

Type of Occurrence: Major Spill

Date: September 29, 2010

Time Started or identified: September 29, 2010 1700 hours

Time Stopped: September 30, 2010 0200 hours

Location: 1003 Ponderosa Drive

Amount: 27,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: City MS4 tributary to Knights Creek

Cause: Inflow and Infiltration due to rain over 4"

Corrective Action: area will be cleaned and lime applied

Upstream sampling site will be: Knights Creek at Lakeland Highway

Downstream sampling site will be: Knights Creek at Hwy 84

Reported by: John P. Waite, Environmental Manager

Contact Number 229-259-3592

#### TRANSMISSION REPORT

(FRI) OCT 1 2010 0:25

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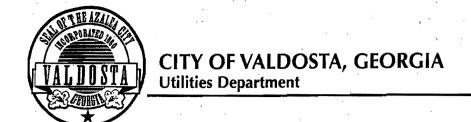
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Water, Sewer & Drainage

Fax

Fax: 404-362-296+ Date: September 30 2010



September 30, 2010

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE:

Report of Major Spill

Dear Mr. Noell,

On September 29, 2010 the City of Valdosta received over four inches of rain. Inflow and infiltration from the storm caused five overflows of combined sanitary wastewater and stormwater from the collection system.

- 1. At 2408 Meadowbrook Drive a manhole overflowed at a rate of approximately 200 gallons per minute for approximately four hours, an estimated total of 48,000 gallons. Wastewater from this overflow entered Sugar Creek behind 2408 Meadowbrook Drive.
- 2. At 2422 Meadowbrook Drive a manhole overflowed at a rate of approximately 200 gallons per minute for a period of approximately four hours, an estimated total of 48,000 gallons. Wastewater from this overflow entered Two Mile Branch behind 2422 Meadowbrook Drive.
- 3. A manhole overflowed at the intersection of College Street and Williams Street, in the vicinity of 212 East College Street at a rate of approximately 25 gallons per minute for approximately four hours, a total of approximately 6,000 gallons. Wastewater from this overflow entered One Mile Branch at the Williams Street crossing.
- 4. At 1003 Ponderosa Drive wastewater overflowed from a residential cleanout at a rate of approximately 80 gallons per minute for approximately 9 hours, a total of approximately 27,000 gallons. Wastewater from this overflow entered the municipal stormwater system tributary to Knights Creek.



5. At 1423 Gornto Road a manhole discharged approximately 75,000 gallons, which entered Sugar Creek downstream of the convergence with Two Mile Branch.

Beginning the morning of September 30, 2010 these sites will be cleaned and lime will be applied for disinfection and odor control. All requirements of the Rules and Regulations for Water Quality Control Chapter 391-3-6-.06 will be met. Upstream and downstream sampling for the major spills into Sugar Creek, Two Mile Branch, and Knights Creek will begin the morning of September 30, 2010.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely, Helly Seeth

Henry Hicks Utilities Director

jpw

January 20, 2011

Ms. Marzieh Shahbazaz
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

RE: Report of Major Spill

Dear Ms. Shahbazaz,

On January 18, 2011 City of Valdosta Utility Department staff responded to a sanitary sewer overflow at 4036 Bemiss Road. The overflow was caused by a blockage in an 8" collection main. A vacuum truck was dispatched and worked to clear the blockage from 3:30 pm until approximately 12:00 midnight. The overflow was active for approximately nine hours. The rate of overflow was estimated to be 50 gallons per minute, a total of 27,000 gallons. Wastewater from this overflow reached Waters of the State, specifically a tributary to Cherry Creek.

The City has determined that the overflow was caused by a grease blockage. The City's response to this overflow will include the following:

1. In May 2010 the City updated the municipal utility ordinance to require all commercial kitchens to provide recurrent maintenance of grease interceptors through periodic pumping of contents. All commercial kitchens discharging to the blocked main were contacted for documentation of recent interceptor maintenance. Two of the commercial kitchens were put on notice that documentation of proper grease trap maintenance must be maintained on site and produced immediately upon request. The City will increase inspections of these grease interceptors for the next three months to document proper maintenance by the customers.



- 2. The main in question provides service to one subdivision off Bemiss Road. Door hangers providing information on the proper disposal of residential oil and grease will be distributed in this subdivision.
- 3. Manholes along this main have been inspected for evidence of residual grease.
- 4. The affected main will be identified as requiring increased cleaning frequency and monitoring to prevent future blockages.
- 5. Upstream and downsteam monitoring of the affected stream began the morning of January 19, 2011 and will continue as required.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks

**Utilities Director** 



#### CITY OF VALDOSTA, GEORGIA Utilities Department

Henry Hicks
DIRECTOR OF UTILITIES

February 8, 2011

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of Major Spill

Dear Ms. Shahbazaz,

On Monday, February 7, 2011, a collapsed manhole on the shoulder of Country Club Drive caused a blockage of a 15" sewer main. The blockage resulted in sanitary sewer overflows from the collapsed manhole and from another upstream manhole. A local utility contractor mobilized equipment and bypass pumps, and the overflows were stopped by 12:40pm.

An estimated total of 187,660 gallons of untreated wastewater was discharged to Three Mile Branch just south of Country Club Drive. Upstream and downstream sampling of the stream was initiated the morning of February 8, 2011.

The bypass pumping is continuing and replacement of the collapsed manhole is underway.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely.

Henry Hicks

Utilities Director



#### TRANSMISSION REPORT

(TUE) FEB 8 2011 5:19

User/Account

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DEST. NUMBER

: 914043822691

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**DOCUMENT#** 

TX START

**DURATION** 

TIME STORED



Water, Sewer & Drainage

Fax

To: Carolyn Hill

From John Waite

Fenc 1-404-362-2691

Dates

Type of Occurrence: Major Spill

Date: February 7, 2011

Time Started or identified: February 7, 2011 07:30

Time Stopped: February 7, 2011 12:40

Location: 825 Northwood Park Drive, near the intersection of Williamsburg Drive and

Country Club Drive

Amount: approximately 187,660 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Three Mile Branch

Cause: Collasped sewer

Corrective Action: Temporary bypass pumps are in place and operating, the collapsed sewer manhole will be replaced along with any piping necessary to complete the repair.

Upstream sampling site will be: 803 Northwood Park Drive

Downstream sampling site will be: 1020 Williamsburg Drive

Reported by: John P. Waite, Environmental Manager

Contact number 229-292-0842

jwaite@valdostacity.com

Comments:

Henry Hicks

February 16, 2011.

Ms. Marzieh Shahbazaz
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Ms. Shahbazaz,

On February 10, 2011 the City of Valdosta wastewater collection system experienced inflow and infiltration from continuing rain in the area. This produced a high peak flow rate at the Withlacoochee WPCP, resulting in a hydraulic overload of the secondary treatment system.

Due to the hydraulic overload the secondary clarifiers suffered hydraulic short circuiting with a resultant loss of solids. The total suspended solids result from the effluent composite sample for February 10, 2011 was 92 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit, constituting a major spill. All reporting and sampling requirements will be followed. The volume of the major spill will be the average daily flow for the facility; 10.3 MG.

In January 2010 the Utility Department finalized its Sanitary Sewer System Assessment and Capacity Analysis Report with recommendations for a long-term rehabilitation program of the sewer collection, pumping and treatment systems. The Utility Department will utilize this to plan to prioritize repairs, rehabilitation and upgrades to the entire sanitary sewer system over the next 20 to 30 years. As part of this long term plan, the City of Valdosta, has contracted for the design of a new force main, sewage pump



stations, new receiving facility and equalization basin at the future Withlachoochee Wastewater Treatment Plant location to eliminate I&I associated with this facility's current 54-inch influent gravity main. In addition, the City is currently planning for the replacement of the Withlacoochee facility.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks

**Utilities Director** 

jpw



#### CITY OF VALDOSTA, GEORGIA

**Utilities Department** 

Henry Hicks
DIRECTOR OF UTILITIES

February 23, 2011

Ms. Marzieh Shahbazaz
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Ms. Shahbazaz,

On Feb. 19, 2011, the Withlacoochee River Water Pollution Control Plant experienced a discharge of a portion of the secondary sludge blankets due to mechanical failure of two of three secondary sludge pumps. The total suspended solids measured in the effluent composite sample for Feb. 19, was 72 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 6.825 million gallons, which equals the 24- hour discharge flow of the plant for this period.

Both of the failed secondary sludge pumps are in the process of being repaired, with one being returned on Feb. 22. A new third sludge pump has been ordered for backup purposes. The city has purchased a Computer Maintenance Management System (CMMS) to facilitate improved maintenance and repair of the mechanical assets within the system. Implementation of the CMMS is ongoing. In addition, the city is currently planning for the replacement of the Withlacoochee facility.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks Utilities Director



October 17, 2011

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Withlacoochee WPCP GA 0033235
Report of Spill

Dear Ms. Shahbazaz.

At 11 a.m., on Oct. 12, a sanitary sewer overflow was discovered at a manhole at the intersection of Patterson Street and Pendleton Drive. The cause of the overflow was a grease blockage in the eight-inch sewer main on Patterson Street. Utilities crews cleared the blockage and stopped the overflow by 11:20 a.m. The initial report of this spill was made via fax.

An estimated 500 gallons of wastewater overflowed and entered Two Mile Branch through the stormwater collection system.

Utilities staff used the vacuum truck to wash Patterson Street, from the overflow site to Two Mile Branch, to remove any debris. Two Mile Branch was checked downstream of the site for possible environmental damage, but no evidence of toxicity or septic conditions were found. Restaurant grease interceptors upstream of the overflow have been checked and found to be in acceptable condition. Door hangers explaining proper disposal of household kitchen grease will be distributed to residences in the area. GIS mapping is being used to identify manholes upstream of the blockage, and these are being checked for possible grease accumulation.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hidds
Utilities Director

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October 17, 2011

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Withlacoochee WPCP GA 0033235 Report of Spill

Dear Ms. Shahbazaz,

At approximately 4:00pm on October 13, 2011 a construction contractor employee informed the City of a leaking manhole on the bank of the unnamed tributary to Lake Sheri that runs along the west side of Twin Street. The discharge was found to be caused by a blockage. The blockage was removed and pipes cleaned by 6:00pm. Wastewater from the overflow entered waters of the state on Twin Street. An estimated 4,600 gallons was discharged to the stream.

Upstream grease interceptors and manholes are being investigated and upstream food service customers are being contacted to encourage proper disposal of brown paper towels. Brown paper towels were found to be a significant part of the blockage when it was removed. Signs are being put in place at the spill site and at Lake Sheri. The discharge was through a seam leak in a manhole that was surcharged due to the blockage. This manhole will be repaired.

Upstream and downstream sampling is not required since this is not a "major spill". However, reconnaissance sampling is being done to document bacteria levels upstream and at Lake Sheri downstream. Lake Sheri is a point of public access for the Lake Sheri Homeowners Association.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Sincerely, Suttle

Utilities Director





#### UTILITY DEPARTMENT



#### **Fax**

To: Carolyn	thei	From	John W	Paite
Fax: 404-362	-2691	Date:	, ,	
Phone:		Page	B:	
Re:		CC <sub>1</sub>		
☐ Urgent ☐ For Rev	iew 🗆 Please C	omment	☐ Please Reply	□ Please Recycle
•Comments:				,
Report of	spill 10/13	12011	· · · · · · · · · · · · · · · · · · ·	
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City of Valdosta, P.O. Box 1125, 1016 Myrtle Street, Valdosta, Georgia 31603-1125

Telephone (229) 259-3592, Fax (229) 241-8285

Type of Occurrence: Sewage Spill

Date: October 13, 2011

Time Started or identified: October 13, 2011 16:00 hrs

Time Stopped: October 13, 2011 18:00 hrs

Location: Behind 1307 N. St. Augustine Road, next to Twin Street

Amount: 4,600 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Twin Street Canal, Tributary to Lake Sheri

Cause: rag blockage

Corrective Action: Rag blockage has been removed and pipes cleaned. Upstream grease interceptors and manholes are being investigated and upstream food service customers are being contacted to encourage proper disposal of brown paper towels. Brown paper towels were found to be a significant part of the blockage when it was removed. Signs are being put in place at the spill site and at Lake Sheri. The discharge was through a seam leak in a manhole that was surcharged due to the blockage. This manhole will be repaired.

Sampling: Upstream and downstream sampling is not required since this is not a "major spill". However, reconnaissance sampling is being done on 14 October 11 to document bacteria levels upstream and at Lake Sheri downstream. Lake Sheri is a point of public access for the Lake Sheri Homeowners Association.

Reported by: John P. Waite, Environmental Manager

Contact number 229-292-0842, or 229-259-3592 iwaite@valdostacity.com

Comments:

: 7518301-960

: OCT 15 0:34

: OCT 15 0:35

: 22sec

: ECM

#### TRANSMISSION REPORT

(SAT) OCT 15 2011 0:35

**DOCUMENT#** 

TX START

**DURATION** 

COM. HODE

TIME STORED

User/Account :

DESTINATION

: 914043622691

DEST. NUMBER

: 914043822691

F-CODE

PAGES RESULT : 2page : OK

**UTILITY DEPARTMENT** 



Fax

To: Carolyn Hill

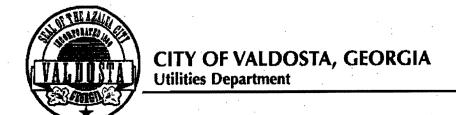
From: John Waite

FAX: 404-362-2691

Date:

Phone:

Pages:



December 1, 2011

Ms. Marzieh Shahbazaz
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

RE: Report of sewage spill

Dear Ms. Shahbazaz:

The Country Club pump station at 3350 Plantation Drive in Valdosta is currently being rehabilitated by Standard Contractors. In preparation for the rehabilitation work a bypass pumping arrangement has been installed by the contractor.

On the morning of November 29, 2011 the station was being bypassed when a connection on the bypass pumping arrangement failed. This allowed wastewater to be discharged to the ground and into Springhouse Creek. The discharge was reported by a resident, and both City crews and the contractor responded immediately.

The spill was reported at approximately 8:15am, and lasted until 8:45am, one half hour. The spill was stopped by shutting down the bypass pump and temporarily restarting the Country Club pump station. A city vacuum truck was dispatched to remove wastewater from the ground around the pump station. City staff walked approximately 2,000 feet downstream to confirm that there was no environmental damage caused by this spill.

The volume of this spill is estimated to be 9,000 gallons. The wastewater entered Springhouse Creek, which is a tributary to the Withlacoochee River. Notifications to the Lowndes County Health Department and to local media have been made and warning signs have been placed at the spill site and downstream access points.

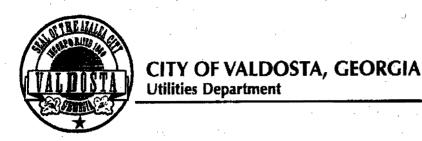


A technician from Godwin Pumps in Jacksonville, Florida arrived at the site shortly after noon on November 29<sup>th</sup> to reassess the pump connection arrangements. He upgraded the hoses and connections to high pressure hoses with bolted flanges to prevent a recurrence of this problem.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks Utilities Director



Henry Hicks

March 6, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

On March 3, 2012, the City of Valdosta wastewater collection system experienced inflow and infiltration from heavy rain in the area with accumulations well over four inches. The increased flow caused an overflow of wastewater from the Bemiss Road Pump Station at 4119 Bemiss Road, Valdosta, Georgia.

Approximately 24,000 gallons of wastewater was discharged to Cherry Creek at Bemiss Road. All reporting and sampling requirements will be followed. This pump station only had a single pump functioning during this rain event. The installation of the second pump was awaiting delivery of replacement piping associated with it. That pipe is now on hand and will be in place by the end of this week.

The City of Valdosta has substantially completed its first phase of its pump station replacement program which includes the Ponderosa, Big Country Club, Eastwind, and Mack Drive Pump Stations. Each of these stations performed extremely well during this rain event considering all are prone to flooding issues which have resulted in spills in the past

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@yaldostacity.com">jwaite@yaldostacity.com</a>

Respectfully,

Utilities Director

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**Utilities Department** 

**Henry Hicks DIRECTOR OF UTILITIES** 

March 12, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East **GA Environmental Protection Division** Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

At 3:00 pm on March 8, 2012 City Utility Department workers discovered wastewater collection system manholes overflowing at 301 South Blanchard Street in Valdosta. Crews responded immediately to locate the cause of the overflow. The overflow was caused by the collapse of a section of 21" ductile iron pipe on the Knights Creek Trunk line approximately 950 feet south of the overflow. Emergency repairs started as soon as equipment could arrive at the site, and the section of pipe was excavated. By 12:00 midnight the pipe was exposed, the blockage relieved, and the overflow stopped.

The city estimates that approximately 189,000 gallons of wastewater overflowed from the collection system and entered waters of the state at 301 South Blanchard Street, entering into a tributary to Knights Creek. Signs warning of the spill have been placed at the spill site and at downstream points of public access at Howell Road, Inner Perimeter Road, New Statenville Highway, and Johnson Road SE. Water quality sampling of the receiving stream was initiated at a location upstream of the spill site (Highway 84) and a location downstream of the spill site (Howell Road) on March 9, 2012. Sampling crews involved in stream quality sampling will also observe conditions at the spill site and the downstream public access points listed to determine what, if any, environmental impacts have occurred.

Work is continuing to make permanent repairs, including the replacement of 151 feet of 21" pipe and the replacement of one manhole.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully.

Henry Hicks

**Utilities Director** 





**Utilities Department** 

Henry Hicks

March 6, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

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If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@yaldostacity.com

Respectfully,

Henry Hicks

Utilities Director

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P.O. Box 1125 **a** 1016 Myrtle Street Valdosta, Georgia 31603-1125





**Utilities Department** 

Henry Hicks DIRECTOR OF UTILITIES

March 12, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

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Work is continuing to make permanent repairs, including the replacement of 151 feet of 21" pipe and the replacement of one manhole.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully,

Henry Hicks Utilities Director





#### CITY OF VALDOSTA, GEORGIA **Utilities Department**

Henry Hicks DIRECTOR OF UTILITIES

March 6, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

On March 3, 2012, the City of Valdosta wastewater collection system experienced inflow and infiltration from heavy rain in the area with accumulations well over four inches. The increased flow caused an overflow of wastewater from the Bemiss Road Pump Station at 4119 Bemiss Road, Valdosta, Georgia.

Approximately 24,000 gallons of wastewater was discharged to Cherry Creek at Bemiss Road. All reporting and sampling requirements will be followed. This pump station only had a single pump functioning during this rain event. The installation of the second pump was awaiting delivery of replacement piping associated with it. That pipe is now on hand and will be in place by the end of this week.

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If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully,

Utilities Director

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**Utilities Department** 

Henry Hicks
DIRECTOR OF UTILITIES

March 12, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

At 3:00 pm on March 8, 2012 City Utility Department workers discovered wastewater collection system manholes overflowing at 301 South Blanchard Street in Valdosta. Crews responded immediately to locate the cause of the overflow. The overflow was caused by the collapse of a section of 21" ductile iron pipe on the Knights Creek Trunk line approximately 950 feet south of the overflow. Emergency repairs started as soon as equipment could arrive at the site, and the section of pipe was excavated. By 12:00 midnight the pipe was exposed, the blockage relieved, and the overflow stopped.

The city estimates that approximately 189,000 gallons of wastewater overflowed from the collection system and entered waters of the state at 301 South Blanchard Street, entering into a tributary to Knights Creek. Signs warning of the spill have been placed at the spill site and at downstream points of public access at Howell Road, Inner Perimeter Road, New Statenville Highway, and Johnson Road SE. Water quality sampling of the receiving stream was initiated at a location upstream of the spill site (Highway 84) and a location downstream of the spill site (Howell Road) on March 9, 2012. Sampling crews involved in stream quality sampling will also observe conditions at the spill site and the downstream public access points listed to determine what, if any, environmental impacts have occurred.

Work is continuing to make permanent repairs, including the replacement of 151 feet of 21" pipe and the replacement of one manhole.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Respectfully,

Henry Hicks Utilities Director

P.O. Box 1125 ■ 1016 Myrtle Street Valdosta, Georgia 31603-1125



Henry Hicks
DIRECTOR OF UTILITIES

March 6, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

On March 3, 2012, the City of Valdosta wastewater collection system experienced inflow and infiltration from heavy rain in the area with accumulations well over four inches. The increased flow caused an overflow of wastewater from the Berniss Road Pump Station at 4119 Berniss Road, Valdosta, Georgia.

Approximately 24,000 gallons of wastewater was discharged to Cherry Creek at Bemiss Road. All reporting and sampling requirements will be followed. This pump station only had a single pump functioning during this rain event. The installation of the second pump was awaiting delivery of replacement piping associated with it. That pipe is now on hand and will be in place by the end of this week.

The City of Valdosta has substantially completed its first phase of its pump station replacement program which includes the Ponderosa, Big Country Club, Eastwind, and Mack Drive Pump Stations. Each of these stations performed extremely well during this rain event considering all are prone to flooding issues which have resulted in spills in the past

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Respectfully,

Henry Hicks
Utilities Director

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## CITY OF VALDOSTA, GEORGIA Utilities Department

Henry Hicks DIRECTOR OF UTILITIES

March 12, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

At 3:00 pm on March 8, 2012 City Utility Department workers discovered wastewater collection system manholes overflowing at 301 South Blanchard Street in Valdosta. Crews responded immediately to locate the cause of the overflow. The overflow was caused by the collapse of a section of 21" ductile iron pipe on the Knights Creek Trunk line approximately 950 feet south of the overflow. Emergency repairs started as soon as equipment could arrive at the site, and the section of pipe was excavated. By 12:00 midnight the pipe was exposed, the blockage relieved, and the overflow stopped.

The city estimates that approximately 189,000 gallons of wastewater overflowed from the collection system and entered waters of the state at 301 South Blanchard Street, entering into a tributary to Knights Creek. Signs warning of the spill have been placed at the spill site and at downstream points of public access at Howell Road, Inner Perimeter Road, New Statenville Highway, and Johnson Road SE. Water quality sampling of the receiving stream was initiated at a location upstream of the spill site (Highway 84) and a location downstream of the spill site (Howell Road) on March 9, 2012. Sampling crews involved in stream quality sampling will also observe conditions at the spill site and the downstream public access points listed to determine what, if any, environmental impacts have occurred.

Work is continuing to make permanent repairs, including the replacement of 151 feet of 21" pipe and the replacement of one manhole.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully,

Henry Hicks
Utilities Director



## City of Valdosta Department of Utilities Report of Sanitary Sewer Overflow or Sewage Spill

Type of Occurrence: Sewage Spill

Date: June 5, 2012

Time Started or identified: June 5, 2012; 0945 hrs

Time Stopped: June 5, 2012; 1015 hrs

Location: North Ashley St. at Two Mile Branch, Lat. 30.8668 and Long. -83.2864

Amount: 1800 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Two Mile Branch

Cause: 8" sewer broken by contractor who was repairing a culvert apron

Corrective Action: When the line was broken the contractor immediately formed an earthen dam to stop the loss of sewage downstream in the creek. The contractor then installed a pipe plug to stop the release of sewage from the broken line. The City is using a vacuum truck to remove the sewage from the manhole upstream of the plug and transfer it to another main. The contractor will provide a pump this afternoon to remove the spilled sewage from the stream and transfer it back to the sewer main. Another plug will be installed in the manhole upstream of the damage and a bypass will be initiated to transfer the sewage from the upstream manhole to the downstream main while the broken pipe is replaced. Signs will be placed at downstream public access points from the spill location to Oak Street.

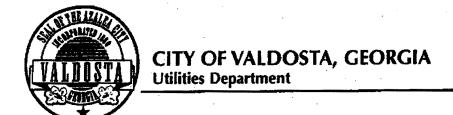
Upstream sampling site will be: N/A

Downstream sampling site will be: N/A

Reported by: John P. Waite, Environmental Manager

Contact number 229-292-0842

jwaite@valdostacity.com



Henry Hicks
DIRECTOR OF UTILITIES

June 8, 2012

Ms. Marzieh Shahbazaz
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

RE: Report of spill

Dear Ms. Shahbazaz:

At 9:45 am on June 5, 2012 a contractor working for the city of Valdosta Engineering Department was performing repairs on a stormwater culvert and a sanitary sewer pipe at Ashley Street and Two Mile Branch when the sanitary sewer pipe being repaired broke. As a result approximately 1,800 gallons of untreated wastewater was discharged into Two Mile Branch.

The contractor immediately constructed an earthen dam to stop flow into the stream and contain the wastewater at the spill site. The contractor then plugged the sewer line to stop the flow of wastewater into the stream. The earthen dam was in place by 10:00 am and the pipe was plugged by 10:15 am.

The city vacuum truck was used to prevent any overflow from the manhole upstream of the plugged line until the contractor could bring in bypass pumping equipment. Once pumps arrived at the site a bypass was started and the wastewater contained at the spill site was pumped back into the collection system. The City issued a press release and placed signs warning of the spill at the spill location and downstream public access points. There are no public water supplies using Two Mile Branch as a water source downstream of the spill location.

The broken section of sewer pipe was replaced on June 7, 2012 and normal collection system service has been restored.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully,

Henry Hicks Utilities Director

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**Utilities Department** 

Henry Hicks
DIRECTOR OF UTILITIES

June 29, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of spill

Dear Ms. Shahbazaz:

At 4:15 p.m. on June 26, 2012, the Utilities Department received a report of a minor sewer overflow at the Cherry Creek pump station #3. The maintenance crew responded immediately and found that the pump station was not operating. The station was immediately restarted, which stopped the overflow. Once the overflow was stopped, the station was evaluated for potential problems, and none were found. The failure was determined to be most likely caused by a brief power outage causing alarm systems in place to not function.

The city estimates that no more than 1,500 gallons and probably much less of wastewater possibly entered waters of the state at Ridge Road. The receiving water is a private pond owned by Cherry Creek North Homeowners Association.

The Utilities department has placed signage at the spill site and is cleaning the area to remove any debris. A bleach solution is being applied to the area for disinfection.

This is a relatively new station but was constructed before our SCADA system was designed and fully implemented. To prevent another such incident, we will be incorporating an auto dialer system as a backup for alarms in this and other pre SCADA stations.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully,

Henry Hicks
Utilities Director





### **UTILITY DEPARTMENT**



## **Fax**

To: Car	olyn H	:11	From:	John W	Daite
Fax: 40	4-362-	2691	Date:	Ture 27.	2012
Phone:			Pages		•
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□ Urgent	☐ For Review	☐ Please Co	omment	☐ Please Reply	☐ Please Recycle
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## City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date: June 27, 2012

Type of Occurrence: Spill

Date of Spill: June 26, 2012

Time Started or identified: 4:15pm

Time Stopped: 5:15pm

Location: 1114 Ridge Road, Valdosta, GA

Amount: 1,500 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Private pond owned by Cherry Creek North Homeowners Association

Cause: temporary power outage

Corrective Action: The maintenance crew responded immediately and determined that the pump station was not operating. The station was immediately restarted stopping the overflow. Once the overflow was stopped the station was evaluated for potential problems and none found. The failure was determined to be most likely caused by a brief power outage. Signs have been placed, the area is being cleaned and disinfected.

Upstream sampling site will be: sampling is not required

Downstream sampling site will be:

Reported by: John P. Waite, Environmental Manager

Contact number: 229-259-3592 (office) 229-292-0842 (cell) or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

7519301-470

JUN 27 22:39

; JUN 27 22:39

: 24sec

: ECM

#### TRANSMISSION REPORT

(WED) JUN 27 2012 22:40

**DOCUMENT#** 

TX START

**DURATION** 

COM. MODE

TIME STORED

User / Account

DESTINATION

914043622691

DEST. NUMBER : 914043822691

F-CODE

**PAGES** 

: 2page

: OK RESULT



#### **UTILITY DEPARTMENT**



# Fax

To: Carolyn Hill
Fax: 404-362-2691

From: John Waite

Tune 27, 2012 Date:

Phone:

Pages:

Henry Hicks
DIRECTOR OF UTILITIES

June 29, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of spill

Dear Ms. Shahbazaz:

The Valdosta area received over four inches of rain from Tropical Storm Debby. Infiltration and inflow of this rainfall into the sanitary sewer system increased the amount of combined wastewater and stormwater being collected and ultimately treated by the Withlacoochee Water Pollution Control Plant.

On June 26, Utility Department staff conducting a morning field inspection of the collection system in the Meadowbrook Drive area found evidence of a minor sanitary sewer overflow at 2412 Meadowbrook Drive near Sugar Creek. The overflow was not active at the time of discovery. The volume of this spill is unknown, but indications at the location show it to be relatively small and significantly less than the 10,000 gallons threshold used for a major spill.

Since the overflow was discovered at a point within 100 feet of Sugar Creek, there is a probability that some of the overflow entered the creek behind 2412 Meadowbrook Drive. Signs warning of the spill have been placed at the spill location and downstream public access points. The area of the spill has been cleaned and disinfected.

The City of Valdosta Utilities Department has an active ongoing manhole inspection and sewer line rehabilitation program which is locating and eliminating sources of infiltration. In addition, the Utility Department has an ongoing lift station rehabilitation and replacement program as well as an EPD approved 30% design for a new force main, sewage pump stations, new receiving facility and equalization basin at the future Withlacoochee Water Pollution Control Plant location. This force main project work was included with the Withlacoochee Plant relocation proposal submitted to FEMA almost two years ago. The force main project in itself should eliminate overflows in the Sugar Creek area due to surcharging of the Withlacoochee interceptor. As you are aware, the City of Valdosta has made every effort and continues to do so to bring a resolution about from FEMA of its proposal.



The Utility Department has seen measurable reductions in I&I through the above work but knows it has much more to do. Our goal is to have zero sewer spills and we will continue to make every effort to meet this goal as quickly as possible.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Respectfully,

Henry Hick

Utilities Director



### **UTILITY DEPARTMENT**



# **Fax**

Ťo: (	Car	olyn	Hill	EPI	From:	John	W	rite	F
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To: Carolyn Hill, EPD

From: John Waite, City of Valdosta

RE: Initial report of spill

Over the past two days the Valdosta area has received over four inches of rain from Tropical Storm Debby. Infiltration and inflow of this rainfall into the sanitary sewer system has increased the amount of combined wastewater and stormwater being collected and ultimately treated by the Withlacoochee Water Pollution Control Plant.

On June 26, Utility Department staff conducting a morning field inspection of the collection system in the Meadowbrook Drive area found evidence of a minor sanitary sewer overflow at 2412 Meadowbrook Drive near Sugar Creek. The overflow was not active at the time of discovery. The volume of this minor spill is unknown, but indications at the location show it to be relatively small.

Since the overflow was discovered at a point within 100 feet of Sugar Creek, there is a probability that some of the overflow entered the creek behind 2412 Meadowbrook Drive. Signs warning of the spill have been placed at the spill location and downstream public access points. The area of the spill will be cleaned and treated with a bleach solution for disinfection.

As a result there is a possibility of increased levels of bacteria associated with the spill and as a precaution the public should avoid contact with Sugar Creek downstream of the spill location. Please direct and questions concerning this spill to Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com.

: 7519301-484

JUN 27 4:31

: JUN 27 4:31

: 24sec

: ECM

#### TRANSMISSION REPORT

(WED) JUN 27 2012 4:31

DOCUMENT#

TX START **DURATION** 

COM. MODE

TIME STORED

Jser/Account :

DESTINATION

: 914043822891

DEST. NUMBER

: 914043622691

F-CODE

: 2page

PAGES RESULT

: OK



### **UTILITY DEPARTMENT**





From:

Date:

Phone:



### **UTILITY DEPARTMENT**



# **Fax**

Tai Can	1. 4.1	/	Date: July 13, 2012						
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City of Valdosta, P.O. Box 1125, 1016 Myrtle Street, Valdosta, Georgia 31603-1125

Telephone (229) 259-3592, Fax (229) 241-8285

GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of spill

On July 11, 2012 the Valdosta area received over two inches of rain in less than an hour from strong storms moving through the area. Infiltration and inflow of this rainfall into the sanitary sewer system increased the amount of combined wastewater and stormwater being collected and ultimately treated by the Withlacoochee Water Pollution Control Plant.

On July 12, Utility Department staff conducting an afternoon field inspection of the collection system in the Meadowbrook Drive area found evidence of a minor sanitary sewer overflow on Meadowbrook Drive near Sugar Creek. The overflow was not active at the time of discovery. The volume of this minor spill is unknown, but indications at the location show it to be very small.

Since the overflow was discovered at a point within 100 feet of Sugar Creek, there is a possibility that some of the overflow entered the creek behind Meadowbrook Drive. Signs warning of the spill have been placed at the spill location and downstream public access points. The area of the spill will be cleaned and treated with a bleach solution for disinfection.

The Utility Department is currently in the bidding process for CCTV televising of specific areas in the sewer collection system flowing into the Meadowbrook sewer interceptor. These areas have been identified as those with the highest probability of inflow and infiltration into the system. Once video of these lines is completed the appropriate method of repairs can be determined and then made to prevent further overflows at this location. The Utility Department is committed to taking measures to eliminate or minimize overflows and to protect the environment.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

#### TRANSMISSION REPORT

(SAT) JUL 14 2012 5:02

Iser/Account :

**IESTINATION** 

: 914043622691 : 914043622691

EST. NUMBER

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AGES **₹ESULT**  : 2page : OK

**DOCUMENT#** 

: 7519301-560

TIME STORED

; JUL 14 5:01

TX START **DURATION**  : JUL 14 5:01 : 25sec

COM. MODE

: ECM



UTILITY DEPARTMENT

**VALDOSTA** 

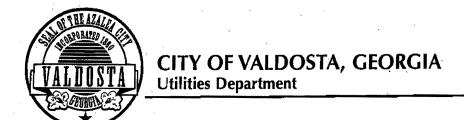
Fax

To: Carolyn Hill
Fax: 404-362-2691

Prom: John Waite
Date: July 13, 2012

Phone:

Pages:



Henry Hicks
DIRECTOR OF UTILITIES

August 10, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

On Aug. 7, 2012, a contractor performing rehabilitation work at the Goodyear pump station on Bemiss Road discovered a leak in one of the bypass pumps being used at the job site. This pump was immediately turned off from the system for repair. As a result of the temporary loss of one bypass pump, sewage began to surcharge from a manhole adjacent to the station.

The pump was repaired in a matter of minutes and was restored to service. By 3:45 p.m., the overflow had been stopped.

The surcharge entered Cherry Creek at Bemiss Road resulting in a minor spill to state waters. The city estimates that approximately 1,000 gallons of sewage entered Cherry Creek between 3:15 p.m. and 3:45 p.m.

Warning signs have been placed at the spill site and at downstream public access points. Questions regarding this minor spill may be directed to Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com.

Respectfully,

Level Duly

Henry Hicks
Utilities Director





### **UTILITY DEPARTMENT**



## **Fax**

To: Ca	rolyn	Hill		From:	John	WA	HITE	
Fax: /-	rolyn 404-3	362-	2691	Date:				
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## City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date: 8 August 2012

Type of Occurrence: Spill

Date of Spill: 7 August 2012

Time Started or identified: 15:15

Time Stopped: 15:45

Location: 4119 Bemiss Road, Valdosta, GA

Amount: 1,000 gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Cherry Creek

Cause: On the afternoon of August 7, 2012, a contractor performing rehabilitation work at the Goodyear pump station on Bemiss Road encountered a pump problem in one of the bypass pumps being used at the job site. This pump developed a leak that required immediate repair. As a result of the temporary loss of one bypass pump sewage began to surcharge from a manhole adjacent to the station. This surcharge entered Cherry Creek at Bemiss Road resulting in a minor spill to state waters. The City estimates that approximately 1,000 gallons of untreated wastewater entered Cherry Creek between 3:15 pm and 3:45 pm.

Repair of the pump was completed in a matter of minutes and the pump was restored to service. By 3:45 pm the overflow had been stopped.

Signs warning of the spill have been placed at the spill site and at downstream public access points.

Contact information: John Waite, Environmental Manager

jwaite@valdostacity.com 229-259-3592 office 229-292-0842 cell

#### TRANSMISSION REPORT

(WED) AUG 8 2012 22:58

User / Account

DESTINATION 914043622691 DEST. NUMBER

: 914043622691

F-CODE

: 2page PAGES

: OK **RESULT** 

**DOCUMENT#** : 7519301-848 TIME STORED AUG TX START : AUG 8 22:58

**DURATION** : 22sec COM. MODE

: ECM



### **UTILITY DEPARTMENT**



# Fax

From: John WAITE

To: Carolyn Hill
Fax: 1-404-362-2691

Date:

Henry Hicks
DIRECTOR OF UTILITIES

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

The Withlacoochee River WPCP receives wastewater flow from about 70% of the City of Valdosta. At approximately 1:00 AM Thursday morning, August 16, 2012, the pumps in the Influent Pump Station failed rendering this station and the treatment plant inoperable. Multiple attempts were made to reset and restart these pumps at the control panel but were unsuccessful. Immediate investigation of the station itself found that the pumps had quickly become fully submerged causing them to not function. This caused a surcharge in the collection system resulting in major spills from two manholes into waters of the state.

- Behind 2412 Meadowbrook Drive, on the bank of Sugar Creek, manhole #W0153 spilled into Sugar Creek. This overflow was discovered at 3:00AM on Thursday, August 16<sup>th</sup>. The City estimates that 2.5 million gallons discharged to Sugar Creek.
- 2. At I75 Exit 18, manhole #W0608 spilled into the Withlacoochee River. This overflow was discovered at approximately 11:00AM on Thursday, August 16<sup>th</sup>. The City estimates that 2.5 million gallons discharged to the Withlacoochee River.

The combined estimated amount of sewage spilled during this time is 5.0 million gallons. This estimate is based on the average daily flow for the Withlacoochee POTW during current operating conditions.



Godwin Pumps was contacted at 1:40 AM Thursday morning to mobilize an emergency bypass pump system to the Withlacoochee POTW. This equipment began arriving at the Withlacoochee plant throughout Thursday afternoon and the bypass pumping system was placed into service at 12:45 AM Friday morning, August 17, 2012, ending sewer overflows.

Cleanup and disinfection of affected spill locations are beginning this morning. Warning signs are being been placed at these spill sites and at downstream public access points. An experienced contractor will be on site today to begin coordinating efforts to get the influent station pumped out, determine the cause of the failure, remove damaged equipment and then make all necessary repairs. The required press release to local media was done yesterday, August 16<sup>th</sup>, and an updated press release is being issued today. A public notice will be published in the Valdosta Daily Times as required.

Stream monitoring of Sugar Creek and the Withlacoochee River upstream and downstream of the spill locations is beginning today.

Following the FEMA denial of the City of Valdosta's Hazard Mitigation Claim to relocate the Withlacoochee POTW to a higher location well outside the current 100-year flood plain, the Valdosta City Council approved a 100% design for a new pump station force main project at their Aug. 9 meeting that will upon completion eliminate this problematic pump station, as well as future sewer overflows in the areas listed above.

Questions regarding this major spill may be directed to Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com or the city's Public Information Office at (229) 259-3548.

Respectfully,

Henry Hicks Utilities Director



### **UTILITY DEPARTMENT**



## **Fax**

To: Ca	ruly, H	i//	From:	From: John WAITE						
Fax: /-	404-363	2-2691	Date:							
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## City of Valdosta Department of Utilities Report of Spill or Major Spill

Report Date: 16 August 2012

Type of Occurrence: Major Spill

Date of Spill: 16 August 2012

Time Started or identified: 01:00

Time Stopped: active at this time

Location: 2412 Meadowbrook Drive

Amount: 1.5 million gallons

Did spill reach "Waters of the State"? Yes

Receiving water: Sugar Creek

Cause: Both pumps at the City of Valdosta's Influent Pump Station located at the Withlacoochee Water Pollution Control Plant (WPCP)—which treats all sewage for two-thirds of city sewer customers—failed on Aug. 16, at about 1 a.m.

Immediate investigation of the station found that the pumps had quickly become fully submerged, causing them to not function.

Godwin Pumps has been contracted to establish a bypass system for the failed pumps, and this work is expected to be complete this afternoon. The actual cause and specific repair needs will be known after the temporary bypass pump system is placed into service later today and the station is pumped out.

The plant was severely damaged by the presidentially-declared disaster in the flood of 2009.

Warning signs have been placed at these spill sites and at downstream public access points. Questions regarding this major spill may be directed to Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com or the city's Public Information Office at (229) 259-3548. Contact information: John Waite, Environmental Manager jwaite@valdostacity.com

229-259-3592 office 229-292-0842 cell

#### TRANSMISSION REPORT

(THU) AUG 18 2012 20:34

COM. MODE

User/Account

DESTINATION : 914043622691 DEST. NUMBER 914043822691

F-CODE

**PAGES** : 2page RESULT : OK

**DOCUMENT#** : 7519301-685 : AUG 18 20:34 TIME STORED : AUG 18 20:34 TX START DURATION : 23sec : ECM

**UTILITY DEPARTMENT** 



Fax

From: John WAite

Phone:

PAGER!

Henry Hicks

August 22, 2012

Kim Hembree Environmental Specialist III Municipal Compliance Unit Environmental Protection Division Georgia Department of Natural Resources

RE: Inspections of streams for possible fish kills

Dear Ms. Hembree,

The City of Valdosta has been active in sampling and inspecting downstream of the major spills reported on August 16, 2012. Thus far no dead fish have been located. The following is a summary of inspections and sampling so far. Please be aware that the path of the Withlacoochee River from SR 133 to US Hwy 84 runs through heavily wooded areas and flood plains that are not safely accessible at this time.

August 16, 2012:

While the spill was still active into Sugar Creek staff inspected Sugar Creek downstream of the point of entry to state waters at 2412 Meadowbrook to a distance of 500 feet downstream. No dead fish were found.

August 17, 2012

This was the first day of stream sampling upstream and downstream of major spill locations. Staff inspected Sugar Creek to a distance of 500 feet downstream of the point of entry no dead fish were found.

Staff inspected the Withlacoochee River at SR 133 downstream of the convergence of Sugar Creek and Withlacoochee River. No dead fish were found.

Staff inspected the Withlacoochee River at the downstream sampling location at US Hwy 84. No dead fish were found



#### August 18, 2012

This was the second day of stream sampling upstream and downstream of major spill locations. Staff inspected Sugar Creek to a distance of 500 feet downstream of the point of entry no dead fish were found.

Staff inspected the Withlacoochee River at SR 133 downstream of the convergence of Sugar Creek and Withlacoochee River. No dead fish were found.

Staff inspected the Withlacoochee River at the downstream sampling location at US Hwy 84. No dead fish were found

August 19, 2012

This was the third day of stream sampling upstream and downstream of major spill locations. Staff inspected Sugar Creek to a distance of 500 feet downstream of the point of entry no dead fish were found.

Staff inspected the Withlacoochee River at SR 133 downstream of the convergence of Sugar Creek and Withlacoochee River. No dead fish were found.

Staff inspected the Withlacoochee River at the downstream sampling location at US Hwy 84. No dead fish were found

August 20, 2012

This was the fourth day of stream sampling upstream and downstream of major spill locations. Staff inspected Sugar Creek to a distance of 500 feet downstream of the point of entry no dead fish were found.

Staff inspected the Withlacoochee River at the railroad crossing 300 feet downstream of the convergence of Sugar Creek and the Withlacoochee River, looking from the railroad trestle. No dead fish were found

Staff inspected the Withlacoochee River at SR 133 downstream of the convergence of Sugar Creek and Withlacoochee River. No dead fish were found.

Staff inspected the Withlacoochee River at the downstream sampling location at US Hwy 84. No dead fish were found

August 21, 20112

This was the fifth day of stream sampling upstream and downstream of major spill locations. Staff inspected Sugar Creek to a distance of 500 feet downstream of the point of entry no dead fish were found.

Staff inspected the Withlacoochee River at SR 133 downstream of the convergence of Sugar Creek and Withlacoochee River. No dead fish were found.

Staff inspected the Withlacoochee River at the downstream sampling location at US Hwy 84. No dead fish were found

Included is a map showing the spill locations and the inspection locations. Also included are stream sampling reports showing results to date for upstream and downstream sampling.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Respectfully,

Henry Hicks

Utilities Director

fewy Grates

#### STREAM MONITORING PROGRAM REPORT FORM FOR A MAJOR SPILL

(Attn: Christine Barber [Permitting, Compliance and Enforcement Program] Fax No. 404-362-2691)

Name of City/County: Valdosta/Lowndes

Spill Amount:

2.5 MG

Date Spill Occurred: August 16, 2012

Date Spill Reported to EPD: August 16, 2012

Spill Location: N. St. Augustine Road 2900 feet northwest of James Road Date of Public Notice (PN):

Name of Receiving Stream Affected: Cherry Creek

Upstream Sampling Location: Withlacoochee River at SR 133

Written Report Submitted To EPD: yes

Downstream Sampling Location: Withlacoochee River at US Hwy 84 Wes Copy of PN Submitted to EPD:

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DAY 1	8/17/2012	4.5	26.3	5.8	32,600	5.6	28.5	6.1	16,800
DAY 2	8/18/2012	3.4	26.1	5.9	1,000	4.6	26.3	6.2	640
DAY 3	8/19/2012	4.6	25.0	6.0	165	4.8	26.3	6.3	1,100
DAY 4	8/20/2012	5.3	25.1	6.4	18,800	5.0	26.1	6.4	8,600
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### STREAM MONITORING PROGRAM REPORT FORM FOR A MAJOR SPILL

(Attn: Christine Barber [Permitting, Compliance and Enforcement Program] Fax No. 404-362-2691)

Name of City/County: Valdosta/Lowndes

Date Spill Occurred: August 16, 2012

Spill Location: 2412 Meadowbrook Drive

Name of Receiving Stream Affected: Sugar Creek
Upstream Sampling Location: 1404 Gornto Road
Downstream Sampling Location: 1423 Gornto Road

Spill Amount:

2.5 million gallons

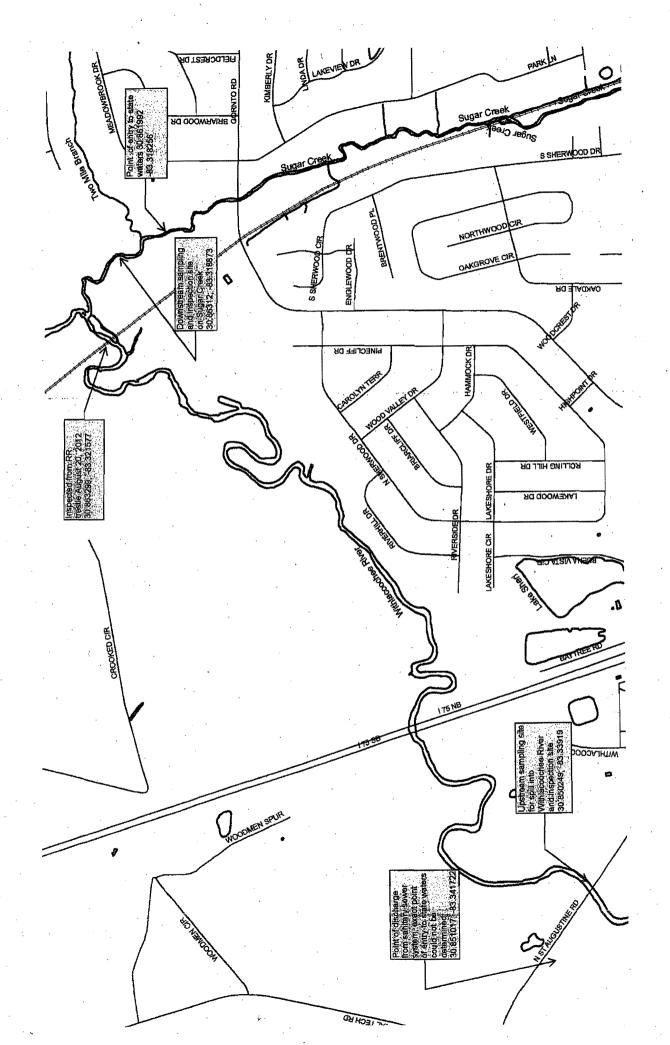
Date Spill Reported to EPD: August 16, 2012

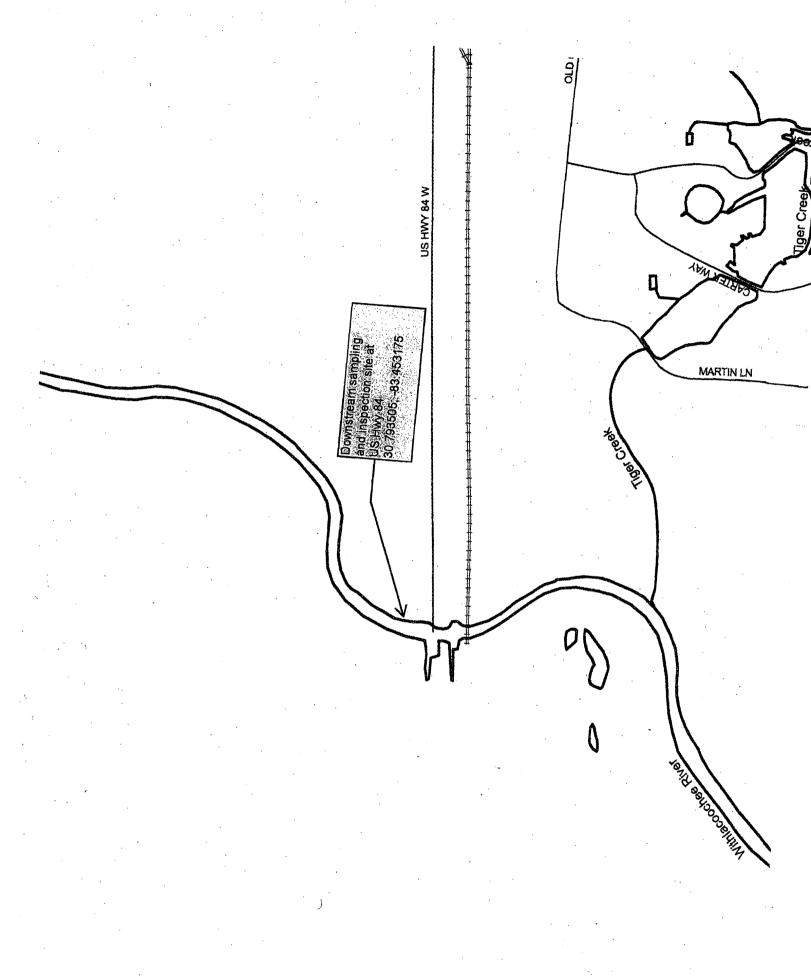
Date of Public Notice (PN):

Written Report Submitted To EPD: yes

Copy of PN Submitted to EPD:

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	DATE	DO	TEMP °C	рН	FCOLI	DO	TEMP °C	рН	FCOLI
DAY 1	8/17/2012	4.6	27.0	7.3	62,800	0.3	26.4	6.8	214,600
DAY 2	8/18/2012	5.4	24.4	7.2	590	2.9	26.1	7.1	7,600
DAY 3	8/19/2012	6.2	26.3	7.3	12,400	3.1	26.2	7.1	880
DAY 4	8/20/2012	7.1	24.9	7.2	9,600	2.2	25.3	7.0	13,200
DAY 5	8/21/2012	8.0	25.2	7.2		6.3	25.8	6.8	. •
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## **UTILITY DEPARTMENT**



# Fax

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#### STREAM MONITORING PROGRAM REPORT FORM FOR A MAJOR SPILL

(Attn: Christine Barber [Permitting, Compliance and Enforcement Program] Fax No. 404-362-2691)

Name of City/County: Valdosta/Lowndes

Spill Amount:

2.5 MG

Date Spill Occurred: August 16, 2012

Date Spill Reported to EPD: August 16, 2012 Spill Location: N. St. Augustine Road 2900 feet northwest of James Road Date of Public Notice (PN):

8/22/2012

Name of Receiving Stream Affected: Withlacoochee River

Upstream Sampling Location: Withlacoochee River at SR 133

Written Report Submitted To EPD: yes

Downstream Sampling Location: Withlacoochee River at US Hwy 84 West

Copy of PN Submitted to EPD: yes

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	DATE	DO	TEMP °C	рН	FCOLI	DO	TEMP °C	рН	FCOLI
DAY 1	8/17/2012	4.5	26.3	5.8	32,600	5.6	28.5	6.1	16,800
DAY 2	8/18/2012	3.4	26.1	5.9	1,000	4.6	26.3	6.2	640
DAY 3	8/19/2012	4.6	25.0	6.0	165	4.8	26.3	6.3	1,100
DAY 4	8/20/2012	5.3	25.1	6.4	18,800	5.0	26.1	6.4	8,600
DAY 5	8/21/2012	4.7	25.2	6.1	2,800	5.4	25.9	6.4	1,010
DAY 6	8/22/2012	4.5	24.9	6.5	1,190	5.2	25.8	6.7	720
DAY 7	8/23/2012	5.5	24.5	6.3	2,800	5.5	25.5	6.6	670
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WEEK 2	8/29/2012	5.0	26.1	6.7	510	5.3	27.5	6.8	660
WEEK 3	9/5/2012	4.5	27.1	6.5	3,400	4.5	28.1	6.6	1,870
WEEK 4	9/13/2012	5.7	24.2	6.6	100	5.0	25.6	6.7	60
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#### STREAM MONITORING PROGRAM REPORT FORM FOR A MAJOR SPILL

(Attn: Christine Barber [Permitting, Compliance and Enforcement Program] Fax No. 404-362-2691)

Name of City/County: Valdosta/Lowndes

Date Spill Occurred: August 16, 2012

Spill Location: 2412 Meadowbrook Drive

Name of Receiving Stream Affected: Sugar Creek
Upstream Sampling Location: 1404 Gornto Road
Downstream Sampling Location: 1423 Gornto Road

Spill Amount:

2.5 million gallons

Date Spill Reported to EPD: August 16, 2012

Date of Public Notice (PN):

8/22/2012

Written Report Submitted To EPD: yes Copy of PN Submitted to EPD: yes

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DAY 2	8/18/2012	5.4	24.4	7.2	590	2.9	26.1	7.1	7,600
DAY 3	8/19/2012	<del>6</del> .2	26.3	7.3	12,400	3.1	26.2	7.1	880
DAY 4	8/20/2012	7.1	24.9	7.2	9,600	2.2	25.3	7.0	13,200
DAY 5	8/21/2012	8.0	25.2	7.2	1,680	6.3	25.8	6.8	1,300
DAY 6	8/22/2012	6.5	26.0	7.2	2,400	5.2	26.5	7.2	1,510
DAY 7	8/23/2012	7.2	24.8	7.2	14,600	4.2	24.1	7.0	15,400
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WEEK 2	8/29/2012	5.8	26.8	7.1	6,800	5.4	26.4	7.1	6,200
WEEK 3	9/5/2012	6.8	25.9	6.9	36,400	5.8	25.7	6.9	34,600
WEEK 4	9/13/2012	8.7	22.7	7.0	525	8.5	22.5	6.8	580
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- REDMAN, 1974, 12 X 70, NEEDS REMODELING FOR A HOME OR STORAGE BLDG.\$2,000 WHITEWATER

-FLEETWOOD, 1998, 24 X 52, 3 BR/2BA,, INC DELIVERY & SETUP..\$24,900 STOCKTON

- GENERAL, 1997, 28 X 70, 3BR/2BA, FIREPLACE, NEEDS SOME REFUB WORK, WHOLE-SALE..\$24,900 STORAGE LOT

- SCOTBILT, 2012, 32 X 68, 3BR/2BA, ENTERTAINMENT CENTER, OVERHEAD DUCTS, 9: CEILINGS WITH TREY, MUCH MORE, ALL NEW WAR-RANTIES WHOLESALE ..\$53,900 STORAGE LOT

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#### **Miscellaneous Notices**

gpn14

Public Notice of Major Sewage Spill

At approximately 1 a.m. on Aug. 16, 2012, the pumps in the Influent Pump Station of the Withlacoochee Water Pollution Control Plant (WPCP) stopped working.

An emergency bypass pump system was placed into service at 12:45 a.m., on Aug. 17; and as a result, the sewer spills are no longer occurring. Contractors are currently on site investigating the cause of the failure, which has not yet been determined, while also making necessary repairs to the damaged equipment.

Sewer overflows were recorded at the following locations within the sewer collection system:

A manhole on Meadowbrook Drive, which overflowed into the Sugar Creek;

A manhole near Exit 18, which overflowed into Withlacoochee; and

A manhole located on Meadowbrook Drive, which did not enter the waterways

Based on the average daily flow for the Withlacoochee WPCP during current operating conditions, the combined amount of sewage spilled at these locations on Aug. 16 is estimated to be approximately five million gallons, constituting a major spill. Clean up and disinfection at affected spill locations are currently underway, and warning signs have been posted at these spill sites and at downstream public access points.

Following the FEMA denial of the City of Valdostas Hazard Mitigation Claim to relocate the Withlaccochee WPCP to a higher location outside the current 100-year flood plain, the Valdosta City Council approved a 100% design for a new pump station force main project at their Aug. 9 meeting. The relocation of the current WPCP will eliminate this problematic pump station, as well as future sewer overflows in the areas listed above.

Questions regarding this major spill may be directed to Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com.

00036953-8/22/12



#### TRANSMISSION REPORT

(SAT) SEP 15 2012 2:59

User / Account

DESTINATION

914043622691

DEST. NUMBER : 914043622691

F-CODE

**PAGES** 

: 4page

: OK RESULT

DOCUMENT#

7519301-839

TIME STORED

: SEP 15 2:58 : SEP 15 2:58

TX START DURATION

: 1min. 10sec

COM, HODE

: ECM



**UTILITY DEPARTMENT** 



# Fax

Kim Hembree

From:

John Waite

Fax: 1-404-362-2691

Date:

Email Correspondence

April 24, 2009

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

Dear Mr. Noell

Over the period of March 26<sup>th</sup> through March 28, 2009 the Valdosta area received approximately two inches of rainfall. Areas to the north of Valdosta received considerably more rainfall. The heavier rains to the north caused flooding of the Withlacoochee River. The following Thursday and Friday, April 2 and 3, 2009, the area received another ten inches of rainfall. The extra stormwater caused a rapid rise of flood waters and brought about the worst flooding of the Valdosta area to occur in the past sixty years. The flooding of the Withlacoochee River led to flooding of Sugar Creek and Two Mile Branch in the area where these streams converge and join the river. Houses along Park Lane, Meadowbrook Drive, Winding Way, and Lake Drive were flooded.

#### Withlacoochee River WPCP

The Withlacoochee River WPCP interceptor line, which carries the wastewater received at the Withlacoochee facility, is located in the affected area. Also in the area are the major trunk lines bringing wastewater to the interceptor. The flood water covering these lines combined with inflow and infiltration from heavy rains caused a hydraulic overload of the Withlacoochee WPCP on March 27<sup>th</sup>. The hydraulic overload caused short circuiting of the secondary clarifiers with a resulting loss of biomass. This led to a "major spill" as defined in the facility permit, the effluent total suspended solids being greater than 1.5 times the seven day maximum average allowed. This City reported by telephone as required and the local media was notified. As the

flood waters continued to rise the interceptor and trunk lines filled with flood water, bringing the flow at the facility to the maximum capability of the influent pumps, 25 MGD. At this high flow rate the facility was unable to maintain even secondary treatment.

Flood water from the Withlacoochee River entered the Withlacoochee River WPCP grounds from the north, surrounded the drying beds, and reached the dyke that had been constructed in response to floods in previous years. On April 3<sup>rd</sup> flood waters began to reach the top of the dyke and emergency action was necessary to prevent flooding of the influent pump station. Utilities department staff were joined by volunteers from other city departments and troops from Moody Air Force Base to fill and place sandbags along the top of the dyke. Flood water continued to rise during the night, and by early Saturday morning, April 4<sup>th</sup>, the sandbags placed the day before were nearly underwater. Once again City staff, troops from Moody Air Force Base, and prison details responded. Local construction firms supplied fill dirt, sand, and gravel along with heavy equipment to increase the height of the dyke. The water continued to rise during the night and on Sunday work continued to strengthen and increase the dyke. On Sunday approximately 120 college students volunteered for work. The river finally crested on the afternoon of Sunday, April 5<sup>th</sup>.

Flood water covered the chlorine contact chambers and the dual media backwash filters at the facility. The Chlorine Building was flooded and electrical power to the building had to be disconnected. The facility was not able to measure flow, disinfect, or sample. The effluent flume was under several feet of water, and the water being pumped through the plant was overflowing the tank walls, first at the dual media filters and eventually at the secondary clarifiers.

The flood water has now receded and Utilities Department staff have been cleaning and evaluating damage. Appendix one below contains information on effected processes, current status, and estimated recovery time.

#### Sanitary Sewer Overflows along Sugar Creek

Flooding of the Withlacoochee River, Sugar Creek and Two Mile Branch in the area where these three converge covered the 30" Sugar Creek bypass sewer, the 18" sewer serving areas between Baytree Road and Meadowbrook Drive, and the 24" sewer from the Three Mile Branch basin. With these lines full at the downstream end several manholes upstream suffered sanitary overflows. Sanitary sewer overflows were noted at 1212 Wainwright Drive, just downstream of Sugar Creek Apartments at the south west corner of the closed Sugar Creek WPCP, at 2310 Park Lane, and at 2408 Meadowbrook Drive. The volume of wastewater spilled could not be determined. Several of the manholes were underwater during the event. The City began upstream/downstream sampling of One Mile Branch and Sugar Creek on April 4<sup>th</sup>.

Included with this report is the stream monitoring data for One Mile Branch/Sugar Creek, and the Withlacoochee River from April 4<sup>th</sup> through April 16<sup>th</sup>.

and these are being repaired. One filter is still out of service for replacement of the overhead electrical cable.

#### Chlorination and De-Chlorination:

The Chlorine Building was flooded and suffered severe electrical component damage. Electricians began working as soon as they could access the building to dry conduit runs and replace components, including two transformers. During the flood the facility had no means of measuring accurate flows, sampling the effluent, or operating chlorination and de-chlorination. The chlorinators themselves were flooded and will be replaced. There was one wall mounted 500 pound per day chlorinator available as a backup that was connected to provide temporary chlorination. Disinfection and de-chlorination were resumed on Saturday, April 11<sup>th</sup>.

The City has ordered new chlorination and de-chlorination equipment. Installation of the new system should take place during the week of April 27<sup>th</sup>.

The effluent flow meter was replaced with a spare and another unit has been ordered. The effluent sampler was flooded and will have to be replaced. Until then the effluent flow proportional composite sample is being collected by hand.

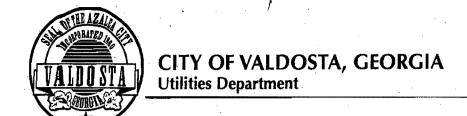
#### Solids Handling:

The air compressor supplying compressed air to the Phoenix belt presses was flooded and is being replaced. This unit is scheduled to arrive on April 27<sup>th</sup>. Belt press motors had to be repaired and have been re-installed. At least one press should be available for service during the week of April 27<sup>th</sup>.

#### Re-use Water System:

The motors for the low pressure re-use water pumps had to be sent out for repair. This work is complete and the low pressure re-use system is operational.

It is important to note that while damaged system are being slowly brought back online, they are operating under seriously deteriorated conditions and could fail at any time. Many components for these systems are still being evaluated for their long term operability which will probably require replacement of whole systems before planned due to age, spare part availability, ongoing reliability concerns and other factors associated with their long term submersion under the flood waters.



Henry Hicks
DIRECTOR OF UTILITIES

June 7, 2009

Mr. Bill Noell
Georgia Environmental Protection Division
Watershed Protection Branch
Compliance and Enforcement East
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: City of Valdosta Ponderosa Pump Station

Dear Mr. Noell

On April 13, 2009 the Ponderosa pump station filled and suffered a sanitary sewer overflow of less than 10,000 gallons. The overflow was reported by John Waite, Environmental Manager with the City of Valdosta. As the overflow did not reach waters of the state no upstream and downstream sampling was necessary. However, Mr. Dill, the home owner at 1001 Ponderosa Drive, did make a complaint to EPD regarding this overflow. The City of Valdosta was contacted by EPD and requested to investigate the complaint.

Mr. Dill was understandably concerned because the pump station is located in his front yard and the sanitary overflow contaminated the yard and driveway. City crews cleaned the area and applied lime for disinfection and odor control. John Waite spoke with Mr. Dill concerning the pump station and Mr. Dill's concerns. The City also supplied Mr. Dill with additional lime to apply as he saw fit to control odor.

The City of Valdosta has contracted with Camp, Dresser, and McKee (CDM) to design upgrades or a complete replacement of the Ponderosa pump station to provide a permanent solution to the problem of sanitary overflows at this site.



If you have any questions or comments concerning this letter please contact John Waite, Environmental Manger, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Securly Stull

Henry K. Hicks Utilities Director On Monday, December 7, 2009, operators at the City of Valdosta's Mud Creek Wastewater Treatment Facility discovered a collapsed manhole just prior to the main influent pump station for the plant. The collapsed manhole receives all sewage feeding the Mud Creek facility through one 21-inch and one 24-inch sewer main and feeds the main pump station through a 30-inch line. All three of these feed lines were significantly damaged as a result of the manhole collapse. Sewage flowing through these lines was contained in the hole surrounding the collapsed manhole and continued to enter the main wet well of the receiving pump station where it continued to be pumped to the facility's headworks's structure and treatment processes. City staff immediately contacted a local underground contractor to begin emergency repairs due to the scope of damage and equipment necessary to make repairs. Two temporary 6-inch pump around systems were set up to pump directly to the main pump station wet well, one each in manholes upstream for the 21-inch and 24-inch lines while equipment to make repairs of the collapsed manhole area was mobilized to the site. By Monday evening the pump around systems were fully functional but downstream lines were unable to be plugged due to high flows coming into the plant.

On Tuesday, December 8, 2009, excavation of the collapsed manhole area had begun and replacement manholes now numbering three due to their level of deterioration as well as associated piping materials were ordered. By Tuesday evening, excavation was substantially complete, but stopped until the downstream lines of both pump around systems could be plugged and the wet well cleaned and dewatered sufficiently to plug it's 30-inch entry line into the wet well. It is important to note that through this period, all wastewater remained contained on site and none entered any water's of the state, nor were any surcharges discovered in the associated collection system coming to this facility.

On Wednesday, December 9, 2009, equipment was brought in to removes an extensive amount of grease, rags and other debris from the wet well prior to an attempt to plug it's 30-inch line which was allowing flow from the wet well back into the excavated pit area around the manhole collapse. A little after noontime rain began to fall again and one of the two functioning wet well pumps become clogged with debris and would no longer pump influent to the headworks. The third available pump was not functioning due to a short in it's control wiring which was being repaired to by a contracted electrician. Prior to an attempt to start this third pump it's motor was tested and found to be shorted. It was then removed and sent out to a motor repair shop for inspection and repair. Plant staff worked to unclog the one pump, thus leaving a single pump to deliver influent to the headworks. As a result, the wet well level began to rise but remained contained within the excavated pit area. The planned attempt to plug the 30-inch line was postponed until the next day. The first of three manholes and associated piping was delivered to the site. By early evening a steady rain was falling and staff noticed that the first upstream manhole from the plugged 21-inch line started to surcharge slightly and the plug on this line was removed, but pump around system remained functioning. This stopped any surcharge from leaving the area immediately around the manhole. Overnight the plant encountered heavy rains

and no further surcharges were encountered on site. The plan would be to plug the 30-inch wet well influent line in the morning of Thursday.

On Thursday, December 10, 2009, morning ongoing heavy rains dictated that the morning's attempt to plug the 30-inch line be postponed until the repaired motor was delivered and installed with a delivery time of 11:00 AM that morning. The clogged pump was continuing to be cleaned and prepared for startup once the third pump was installed and ready. At approximately 1:30 PM, the department's Environmental Manager reported that he had discovered a series of manholes upstream of the Mud Creek Plant serving the bypassed 21-inch main to that plant which had surcharges the previous evening. He estimated that approximately 500,000 gallons of sewage spilled and entered the waters of the state. This was reported to EPD and the Health Department. The repaired motor was reinstalled and tested by 5:00 PM and all three pumps in the main pump station were started in order to dewater the wet well so the 30-inch plug could be installed and repairs to the damaged manholes could proceed. The bypass pumps were turned off to stop flows into the wet well in order to speed up this process. We anticipate that as a result of shutting down the bypass pump systems that more sewer surcharges would occur within the sewer collection system feeding the plant until the plug could be installed and bypass pump systems restarted. Due to the significant amount of mud in the wet well the dewatering process was not completed until approximately 8:30 PM, the plug was installed and bypass pump systems restarted. At 9:30 PM both newly installed pumps failed leaving a single pump to handle flow. As a result, both pump around systems were periodically shut off during the evening to avoid overflow the wet well. This action probably caused additional surcharges from the collection system flowing to the Mud Creek Facility.

On Friday, December 11, 2009, repairs on one of the manholes were begun by the contractor. We estimate that repairs of the three affected manholes and associated piping will be completed by December 18<sup>th</sup> weather permitting. Both pump around systems are being intermittently shut down avoid overflowing wet well into the excavated areas for manhole replacement and piping repairs. Another contractor was contacted to bring in necessary pumps, piping and associated equipment to do bypass pumping directly to the headworks in order to allow replacement of manholes and piping work to proceed quickly. Only one of the two damaged pumps will be removed for repairs because of a nonfunctional isolation valve on the other pump. Once bypass pumping to the headworks is underway, the remaining failed pump will be removed for repair as well. Upon completion of all necessary repairs and flushing of affected force mains, the plant will be returned to normal pumping operation. A press release and formal Public Notice was issued. Signs were posted in affected areas and upstream and downstream sampling started. Mary Sheffield of EPD visited the site Friday afternoon.

Early Saturday morning, December 12, 2009, one of the pumps used for pump around failed and was replaced with a spare pump on site. The bypass pump system contractor arrived on site at 8:00 AM and began work on installing two 12-inch bypass systems along with associated piping

to the facility's headworks structure. Heavy rains prevented the underground contractor from undergoing any additional repair work on the manholes and associated piping to the plant influent pump station. Pump around systems continued to function without further problems.

On Sunday, December 13, 2009, both bypass pump systems and piping to the headworks were installed and fully functional at 5:00 PM. Heavy rains continue. Flows measured at the plant were approximately 3.5 MGD due to ongoing rain. Rain is expected to continue until Wednesday morning.

Until all repairs are made, bypass pump system will be operated around the clock to minimize potential surcharges from the sewer collection system feeding the Mud Creek Facility.

Below are our estimated sewer surcharge totals for this period are as follows:

Date	Recorded Flow	Estimated loss
12/8/09	3.0 MG	0.55 MG
12/9/09	2.4 MG	1.15 MG
12/10/09	2.4 MG	1.15 MG
12/11/09	2.2 MG	1.35 MG
12/12/09	2.6 MG	0.95 MG
12/13/09	3.2 MG	0.35 MG

The estimated total spilled is 5.5 MG.

If you require any additional information, please contact us.

January 6, 2010

Mr. Bill Noell
Unit Coordinator
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

Dear sir,

Below is a summary of my efforts regarding the City of Valdosta Utility Department since taking on the responsibilities as Utilities Director on October 13, 2008.

The first two to three months on the job was spent performing an overall assessment of the utility including but not limited to budget (revenues and planned expenditures), available resources, CIP and R&R plans, staffing, operational and maintenance procedures as well as the safety and training needs of the department to name a few.

As a result of this assessment I found that overall planning, budgeting, coordination and documentation for infrastructure maintenance and capital improvements was lacking, and utility operations were lacking similar direction, including the use of SOPs and training. To address these multiple issues the following action plan was developed.

- 1. A formal safety training plan was initiated for all divisions within the department.
- 2. Each division head was tasked to begin development of Standard Operating Procedures for their respective facility of job functions.
- 3. A career track program for staff training and advancement was developed and put into the FY09 Budget. As part of the career track the department would undergo a reorganization once new building was completed, centralizing key activities (centralized maintenance, centralized laboratory) as well as combining similar job functions and equipment usage under one division distribution/collection/drainage) centralized lines maintenance. Treatment plant operators would be required to cross train in both water and wastewater treatment to move up in their career track.
- 4. Each division head was tasked to develop both a short term and 20-year capital improvements plans for their division.
- Regular monthly staff meetings were implemented for each division with upper management to discuss all issues or concerns as well as to update them on progress and new initiatives.

- 6. Division heads would become responsible for tracking and developing their division's budget annually.
- 7. Weekly division head staff meetings were initiated to discuss and coordinate activities, plans, needs and address common issues across divisional boundaries as well as to coordinate with other departments and agencies.
- 8. Monthly reports from each division head were required to document monthly activities, accomplishments, status on facilities and equipment.
- 9. Interviewing and hiring key management positions vacated through early retirements as well as new budgeted positions within the organization.
- 10. CDM completed final design, permitting, and bidding for Mud Creek Expansion project. Work has started on this.
- 11. In February of 2009, CDM completed its draft Draft Sanitary Sewer Condition Assessment and Rehabilitation Program Plan as well as a Sanitary Sewer Modeling and Capacity Report. Both are attached in this package.
- 12. As the FY09 Budget was being prepared the follow capital items were included and are being implemented:
  - A new building which had been in the budget for over 5-years would be completed. Distribution, Collection and Drainage staff were working out trailers that were deteriorating quickly. This building is expected to be completed in April 2010 and will house all operational staff with the exception of the treatment plants.
  - A Computerized Maintenance/Asset Management System would be purchased for use in all department functions. This program will be purchased and implemented in January 2010.
  - The department would implement a Standards and Specifications Manual with Details for all water sewer and storm water equipment and infrastructure.
     This manual is approximately 85% complete.
  - Two problem lift stations (Ponderosa and Big Country Club) would be replaced using new standards manual. Design is complete and property purchased for Ponderosa project. Two additional lift station will be replaced under FEMA mitigation once plan is approved. All new or rehabilitated lift stations will utilize submersible pump systems and have full remote monitoring and control capabilities through a new SCADA System.
  - The SCADA system would be implemented for all treatment, lift station, repump and other associated facilities. The radio survey necessary to determine radio type and antenna requirement was just completed. Existing lift stations, treatment facilities or remote locations will have remote monitoring capabilities only until they are either replaced or fully rehabbed at which time remote control capabilities will be added.

- \$200,000 was budgeted for each of the next five years to do annual contracting of smoke testing and CCTV of sanitary sewer system.
- The department purchased CCTV equipment and trailer to use in identifying sewer system problems for immediate repair in December 2009. This equipment allowed us to find a major source of inflow into one of our main lines following recent repairs to the Mud Creek influent manholes and lines.
- A third sewer vacuum truck was purchased in December 2009 to replace our oldest truck.
- Extension of water and sewer services to annexed islands. Two have been completed to date third is underway.
- In March of 2010 we will be bringing a FOG Ordinance to the Mayor and Council for adoption.
- Adequate funding was allocated to remove excess biosolids inventory from both wastewater plants and allow for ongoing weekly disposal (landfill) of biosolids generated by each facility.

Three major events occurred within the Valdosta Utility System over the past 14 - months which significantly hampered our planning and improvement plans. They are as follows:

- 1. In December 2008, one of the two main electrical breakers and associated relays at the Mud Creek Facility failed. This equipment as almost all equipment with the utility system was almost 30-years old and spare or replacement parts were not available for repair. A suitable replacement breaker had to be found and installed to ensure functional reliability of this plant until expansion was complete sometime in 2011. This project took over two months to complete at a cost of approximately \$50,000.00.
- 2. In late March and early April of 2009, many areas of Valdosta and more specifically the Withlachoochee Treatment Plant and two lift station systems were inundated in flood waters which ultimately led to a state and federal disaster declaration. The planned replacement of this facilities main pump station equipment had been scheduled to start on April 4, 2009. As a result of the flooding of over 30% of this facility was under flood waters and this scheduled work was not able to take place. In addition, this work could not take place after the recovery effort due to the fact that FEMA would not cover any costs if the work was completed and their mitigation plan did not cover the relocation of this equipment once installed. As a result the contract for this work was cancelled and all design fees, storage costs and equipment previously ordered was paid by the City of Valdosta. The equipment remains in storage awaiting the outcome of the FEMA mitigation plan. The majority of sewer rehab work planned and budgeted for the collection system rehab to this facility was

- also put on hold until a mitigation plan was approved by FEMA. The recovery process for this facility alone has taken several months to complete and bring the facility back to pre-flood condition. It is important to note that pre flood condition were far from acceptable. The recovery costs alone are approaching \$1.0 million as we still are seeking one additional quotation for a replacement biosolids conveyor system.
- 3. At the beginning of December 2009, the main manhole receiving all influent into the Mud Creek Facility and leading to the influent main pump station collapsed along with associated piping. Private contractors were needed to handle the repairs and bypass pumping due to the extensive damage and equipment needed to make repairs. City staff worked around the clock with these contractors to make repairs as quickly as possible. Ultimately, three main manholes and associated piping needed to be replaced. In addition, once these repairs were made a major leak was discovered by our CCTV equipment just downstream from one of the plugged influent lines allowing significant ground water into the repaired manholes and lines. A separate contractor was brought in to make this repair. The leak was due to a missing gasket in the pipe joint that had probably been missing since it's original installation. Heavy rains during this entire period significantly slowed repairs efforts. This facility was not returned to normal operations until the first week of January 2010. The repair costs for this work are estimated to be over \$150,000.00.

This summary does not include other significant failures within the sewer system nor everything undertaken or accomplished within it, but is meant to give as broad a perspective of actions taken to date. Both a Water System Assessment and Stormwater Master Plan Update are underway. Upon their completion, this information along with the recently completed Sewer System Assessment and Reha Plan will be incorporated in a request for a formal rate study in the upcoming FY10 budget.

Finally, this summary does not address the issues, extensive work accomplished, underway or planned in our water treatment, distribution and storm water systems.

If you have any question or require additional information, do not hesitate to contact me.

Respectfully,

Henry Hicks, Director of Utilities City of Valdosta

Henry Hicks
DIRECTOR OF UTILITIES

January 23, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of Major Spills

Beginning on January 20, 2010 and continuing January 21, 2010 the Valdosta area experienced a rain event that produced an accumulation of approximately three inches of rain. Inflow and infiltration from the heavy rainfall entered the City wastewater collection system and exceeded the carrying capacity of the system in several areas. This condition resulted in six major spills.

At 817 Gornto Road a manhole and cleanout overflowed at a rate of 50 gallons per minute for approximately 407 minutes. The estimated total volume released was 20,350 gallons. Wastewater entered the municipal stormwater system that is tributary to Two Mile Branch and Jo Ree Lake (Millpond).

At 1001 Ponderosa Drive a manhole and cleanout overflowed at a rate of 10 gallons per minute for approximately 1210 minutes. The estimated total volume was 12,100 gallons. Wastewater from this overflow entered the municipal stormwater system that is tributary to Knights Creek.

At 2422 Meadowbrook Drive a manhole overflowed at a rate of 150 gallons per minute for approximately 920 minutes. The estimated total volume was 138,000 gallons. Wastewater from this overflow entered Two Mile Branch downstream of the Millpond, which is tributary to Sugar Creek.

At 2408 Meadowbrook Drive a manhole overflowed at a rate of 400 gallons per minute for approximately 1125 minutes. The estimated total volume was 450,000 gallons. Wastewater from this overflow entered Sugar Creek downstream of Gornto Road.

At the intersection of Cypress and Mystic a manhole overflowed at a rate of 50 gallons per minute for approximately 1280 minutes. The estimated total volume was 64,000 gallons. Wastewater from this overflow entered the municipal stormwater system that is tributary to an un-named stream leading to Dukes Bay Canal.



Laboratory results from the Withlacoochee WPCP, 3352 Wetherington Lane, Valdosta indicate that the facility suffered a washout of solids due to excessively high flow caused by inflow from the rain event. The total suspended solids released from the facility on January 21, 2010 were in excess of 1.5 times the allowed weekly average. This constitutes a major spill as defined in the facility permit. The volume of the major spill is 15.4 million gallons, which is the reported flow through the facility for January 21, 2010. The facility discharges to the Withlacoochee River.

Laboratory results from the Withlacoochee WPCP indicate that the solids loss due to high flow continued on January 22, 2010. The total suspended solids concentration in the effluent sample for January 22<sup>nd</sup> was 76 mg/l, which was again greater than 1.5 times the allowed weekly average. This constitutes a separate major pill as defined in the facility permit. The volume of the major spill is 14.9 million gallons, which is the reported flow through the facility for January 22, 2010.

On January 22, 2010 the Utilities Department began monitoring of the affected streams in accordance with the Georgia Rules and Regulations for Water Quality Control.

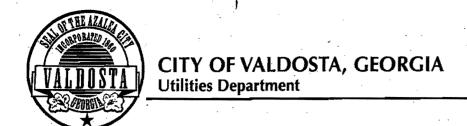
In January 2010 the Utility Department finalized its Sanitary Sewer System Assessment and Capacity Analysis Report with recommendations for a long-term rehabilitation program of the sewer collection, pumping and treatment systems. The Utility Department will utilize this to plan to prioritize repairs, rehabilitation and upgrades to the entire sanitary sewer system over the next 20 to 30 years.

Any questions or comments concerning these overflows may be directed to John Waite, Environmental Manager at 259-3592 or jwaite@valdostacity.com

Sincerely,

Henry Hicks

**Utilities Director** 



Henry Hicks
DIRECTOR OF UTILITIES

January 26, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Sanitary Sewer Overflow 701 Cypress Street

On January 25, 2010 Utility Department personnel discovered a sanitary sewer overflow from a manhole in the vicinity of 701 Cypress Street. The cause of the overflow was determined to be structural collapse of one side of the manhole. An estimated 34,000 gallons of wastewater was released to the municipal stormwater system that drains from Cypress Street to Forrest Street. The overflow was stopped at approximately 3:00 pm.

On January 26, 2010 the manhole was excavated and replaced with a pre-cast concrete manhole. The new manhole is now in service.

This collapse occurred in an older section of the collection system where brick manholes are still prevalent. The Utilities Department is beginning a physical inspection of the other manholes in the area to identify any others that may need to be replaced quickly to prevent further overflows. This inspection is beginning today, January 27, 2010.

Please address any questions concerning this overflow to John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely

Henry Hicks

**Utilities Director** 



Mr. Bill Noell
Unit Coordinator
Compliance and Enforcement Unit East
GA Environmental Protection Division
Watershed Protection Branch
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

Dear sir.

Per your request, below is a summary of sewer system capital related projects we expect to complete in this year's budget (ending June 30, 2010) and the projects planned in the following budget year (starting July 1, 2010 through June 30, 2011) as well as other necessary actions required to complete associated work over the coming years. This list does not include critical projects related to the water system.

#### Current Budget

- Ponderosa and Big Country Club Lift Station Replacements designs are complete and existing home on the Ponderosa property is expected to be demolished before the end of April. CDM is finalizing designs on four additional lift stations so we can put multiple lift stations out to bid at once. Dependent on bid pricing received for this work, we expect work to start on at least Ponderosa and Big Country Club before June 30<sup>th</sup> and may be able to start work on additional stations under current budget, carrying funds forward into the next fiscal year. We have approximately \$1,000,000 remaining in our budget for this work as well as \$500,000 in GEFA funding available.
- Mall sewer interceptor rehab we will be requesting bids once final design is completed for a new lift station and force main to replace this interceptor. We expect design and bid documents will be completed by June 30<sup>th</sup> as well. We have approximately \$350,000 in GEFA funding available for this work.
- Sewer system evaluations a RFP will be advertised for CCTV or other technology evaluation methods on selected sewer system starting with major interceptors. We have approximately \$350,000 in funding available for this work.
- Mud Creek Wastewater Plant Expansion Work has started and will be completed in late 2011. This project is funded through GEFA (CWSRF) and ARRA at \$45,000,000.
- Implementation of SCADA in all lift stations Currently have \$400,000 in budget. Awaiting consultants recommendation on radio technology to be used before bidding work.
- CMMS computerized maintenance management system will be purchased for use throughout all department division under the Mud Creek Expansion Contract and implemented before June 2010.
- FOG Prevention Ordinance Should be adopted by end of May.

#### Proposed Budget for FY11

- Rate Study at \$150,000.
- Design and construction of new force main, pump station and equalization basin
  to the Withlachoochee Wastewater Plant at an estimated cost of \$30,000,000. This
  project is not funded as yet and we will be applying for funding through the next
  round of GEFA Loans. \$2,200,000 is proposed for the design, easement
  purchases, etc. in the budget if funding is approved. An RFP is currently being
  advertised for selection of a firm to do this work.
- Sewer system assessment for rehab \$600,000 is budgeted for assessment of sewer system, starting with major interceptors and trunk lines. Funding is through SPLOST.
- Mud Creek and Withlachoochee sewer system rehab \$2,375,000 is budgeted for this work using SPLOST Funds. Additional funds for more work will also be requested under next round of CWSRF funding.
- Replacement of ten lift stations Estimated cost is \$2,000,000. This project is not yet fully funded. Requests for funding have been submitted for special appropriation and a request for GEFA funding will be submitted under next round of CWSRF. Currently have \$500,000 under existing GEFA Loan.
- Withlachoochee Wastewater Plant Upgrades \$1,250,000 is budgeted using SPLOST funds. This work is currently on hold until a final resolution from FEMA is received on mitigation plan resulting from severe flooding of this facility last spring. An RFP will be advertised to develop a proposed scope and plan for this work under this budget.

Again this summary doe not include capital projects planned for the water system. If you have any questions please call me at your convenience.

I am also formally requesting a meeting with you and staff as well as the Director of EPD to discuss a formal action plan by the City of Valdosta, approved by EPD, in order to avoid a consent order at this time. Should the City of Valdosta fail to meet the requirements of this plan as prescribed by EPD, we would accept a formal consent order without challenge.

Respectfully,

Henry Hicks Utility Director City of Valdosta



### CITY OF VALDOSTA, GEORGIA

Water, Sewer, and Drainage Department

Leon V. Weeks
DIRECTOR OF UTILITIES

February 26, 2008

Mr. Bill Noell, Unit Manager Georgia Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, GA 30354

RE: Mud Creek POTW NPDES Permit # GA0020222 Withlacoochee River POTW NPDES Permit # GA0033235

Dear Mr. Noell:

During the week of February 18<sup>th</sup> to 22<sup>nd</sup> the Valdosta area received in excess of eight inches of rainfall. Five inches fell on February 21<sup>st</sup>, and another two inches on February 22<sup>nd</sup>. The heavy rainfall has caused flooding of the Withlacoochee River and local streams and a manhole cover and cone was knocked loose underwater in the Withlacoochee River floodplain. In addition, inflow and infiltration from the heavy rainfall caused five sanitary overflows and overloaded the Withlacoochee River Water Pollution Control Plant. At present parts of the collection system near the Withlacoochee River are under flood waters. The flood waters are entering the outfall manhole causing continued high flows at the Withlacoochee WPCP.

The following events occurred during and immediately following the event on February 22:

- 1. The Ponderosa Lift Station overflowed and flow entered a tributary to Knights Creek
- The Mack Drive Lift Station overflowed and flow entered Two Mile Branch.
- The Dukes Bay sewer main was overloaded and wastewater exited a manhole at Tucker Road and an overflow entered Dukes Bay Canal, a tributary to Mud Creek.
- 4. A manhole overflowed on the Valdosta Country Club property. Flow entered Stillhouse Branch, a tributary to the Withlacoochee River.
- 5. A manhole overflowed for a short period at 817 Gornto Road. Flow entered the Municipal Separate Storm Sewer System (MS4).



The With I acoochee River Water Pollution Control Plant suffered a washout of the biomass from the secondary treatment system due to high flows. This resulted in a high total suspended solids discharge on February 21, 22nd, 23rd, and 25th. Effluent total suspended solids from all four days were in excess of 1.5 times the weekly permitted discharge, meeting the definition of a major spill.

Date	Daily Flow (MGD)	TSS (mg/l)
February 21, 2008	7.7	94
February 22, 2008	15.5	417
February 23, 2008	15.2	471
February 25, 2008	16.4	83

The City of Valdosta and CDM are presently involved in an Inflow/Infiltration study. Flow monitors and rain gauges are in place and recorded this storm event. The results of this study will allow planning for upgrades and repairs to lessen future inflow and infiltration.

The City of Valdosta has reported the overflows and spills and has initiated upstream/downstream sampling of the receiving waters. As the river recedes, the City will repair the damaged manhole and any other parts of the system to minimize problems as much as possible now as we also proceed to complete the system evaluation and rehabilitation. The City has already set aside a GEFA Loan and funds from the present Special Purpose Local Option Sales Tax.

Please call Mr. John Waite, Environmental Manager if you need additional information.

Sincerely,

Leon V. Weeks

Director of Utilities

CC: Mr. Larry Hanson

son Ullecho

Henry Hicks
DIRECTOR OF UTILITIES

July 19, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: report of Sanitary Sewer Overflow

CORRECTED REPORT

Dear Mr. Noell;

On Sunday, April 18, 2010 a sanitary sewer overflow occurred from a manhole at 1201 Ponderosa Drive in Valdosta. The overflow was caused by a grease blockage in an 8" sewer line. This is a residential neighborhood.

The overflow was located at approximately 1:00 pm. Utility Department staff responded with a vacuum truck and the blockage was cleared at approximately 3:00 pm. The total volume of overflow is estimated to be 500 gallons. Wastewater entered the separate storm sewer system and reached an un-named tributary to Knights Creek. After clearing the blockage the Utility crews cleaned around the manhole and applied lime for disinfection. Sewer cleaning was performed in the area on both Sunday and Monday. On Monday Utility staff inspected the receiving stream to ensure that there was no fish kill or other notable environmental damage.

On April 19, 2010 the City faxed a report of this overflow to the EPD office. The faxed report correctly identified the date of the event as April 18<sup>th</sup>. However, in the written report dated April 20, 2010, the date was incorrectly identified as "Sunday, April 17, 2010". This has made it appear that there were two separate overflows, when in fact there was only one.

In reviewing City records we have found several other errors that need to be corrected.



- On January 19, 2008 the Withlacoochee WPCP suffered a washout of secondary sludge blanket due to hydraulic overload of the secondary system. This resulted in high effluent total suspended solids, 90 mg/l in the twenty four hour composite. The Environmental Manager, John Waite, made the initial report and then wrote a draft written report that was submitted to the Utilities Director for editing/approval and signature. The Director at that time was Mr. Leon Weeks. At that time Mr. Waite would not necessarily see the final signed letter or have received a copy. It is our understanding that EPD is unable to locate this report in the file. The City of Valdosta is also unable to locate a copy of the signed letter. However, Mr. Waite does still have the electronic copy of the draft letter, which is included with this letter.
- 2. On February 21, 2008 inflow and infiltration from heavy rain in Valdosta caused a hydraulic overload of the Withlacoochee WPCP which culminated in a major spill due to high total suspended solids in the effluent. The heavy rain continued and the Withlacoochee plant continued to discharge high TSS on February 22, 23, and 25, 2008. In addition, there were five sanitary sewer overflows from the collection system on February 22, 2008. All of these were reported in a single letter dated February 26, 2008. Again it is our understanding that EPD is unable to locate the report letter in the file. The City has located a copy of the signed letter, which is included in with this report.
- 3. On August 23, 2008 the City suffered heavy rain in association with Tropical Storm Fay. This caused hydraulic overloads in the system, culminating in two days of major spills at the Withlacoochee WPCP and several sanitary sewer overflows. EPD has provided a list of spills for which written reports have not been received; one of which is an August 23, 2008 spill at #2 Cherokee Circle into Stillwater Branch. Mr. Waite's records indicate that this discharge was approximately 1000 gallons and did not reach waters of the state. There may have been a miscommunication over the telephone during the original reporting of these incidents. The attached copy of the written report documents the 1000 gallon overflow along with the other events associated with Tropical Storm Fay. The City requests that this report be accepted as the written report of the August 23<sup>rd</sup> overflow of the Country Club pump station at #2 Cherokee Circle.
- 4. On February 5, 2010, the influent pump station at the Mud Creek WPCP, 1638 New Statenville Road, was bypassed to allow repairs to pumps and check valves that could not be performed with wastewater in the station. The plug in the east trunk line failed and the station wet well was filled with wastewater. Wastewater from the wet well began entering the dry well portion of the station through the #2 pump, making it necessary to stop repairs and evacuate the dry well for the safety of personnel. Wastewater was

pumped from the station onto the ground for 3.5 hours in an attempt to replace the plug and continue repairs in safety. Pumping ceased at 5:00 pm. Environmental Manager John Waite thought that this discharge was reaching waters of the state at Mud Creek and faxed an initial report. The next day he was informed by the plant superintendent that the wastewater was contained within a storm water detention pond constructed in association with the plant expansion work. This wastewater was contained within the detention facility until dried through evaporation and percolation. To prevent future errors of this type, Mr. Waite has written a new standard operating procedure for sanitary sewer overflow investigation that requires Mr. Waite or a designated staff member to follow any overflowing wastewater to the end point. If the flow is reaching waters of the state, the point will be documented with photographs and the position described as closely as possible.

Any questions or comments concerning these overflows may be directed to John Waite, Environmental Manager at 259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Heury Wield

Henry Hicks

**Utilities Director** 

jpw

February 4, 2008

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, GA 30354

RE: Major Spill Report
Withlacoochee WPCP, NPDES Permit # GA0033235

Dear Mr. Noell;

During the period of January 16, 2008 through January 19, 2008 the Valdosta area received over two and one half inches of cumulative rainfall. This caused an increase in flow at the Withlacoochee WPCP, with a peak approaching a rate of 18 MGD. For a time during the peak flow the secondary clarifiers suffered a hydraulic overload and discharged secondary blanket to the chlorine contact chamber. The twenty four hour composite sample from January 19<sup>th</sup> contained 90 mg/l of total suspended solids. This meets the definition of "major spill" contained in permit GA0033235. The total daily flow for January 19<sup>th</sup> was 6.473 MG. The required sampling program of the receiving stream has been initiated.

The City of Valdosta has hired consulting engineers to aid in location and repair of inflow and infiltration, collection system improvements, and wastewater treatment plant upgrades and expansion to achieve and maintain environmental compliance.

Sincerely,

Leon V. Weeks Utilities Director



# CITY OF VALDOSTA, GEORGIA Water, Sewer, and Drainage Department

Leon V. Weeks

February 26, 2008

Mr. Bill Noell, Unit Manager Georgia Environmental Protection Division Water Protection Branch 4220 International Parkway, Suite 101 Atlanta, GA 30354

RE: Mud Creek POTW NPDES Permit # GA0020222 Withlacoochee River POTW NPDES Permit # GA0033235

Dear Mr. Noell:

During the week of February 18<sup>th</sup> to 22<sup>nd</sup> the Valdosta area received in excess of eight inches of rainfall. Five inches fell on February 21<sup>st</sup>, and another two inches on February 22<sup>nd</sup>. The heavy rainfall has caused flooding of the Withlacoochee River and local streams and a manhole cover and cone was knocked loose underwater in the Withlacoochee River floodplain. In addition, inflow and infiltration from the heavy rainfall caused five sanitary overflows and overloaded the Withlacoochee River Water Pollution Control Plant. At present parts of the collection system near the Withlacoochee River are under flood waters. The flood waters are entering the outfall manhole causing continued high flows at the Withlacoochee WPCP.

The following events occurred during and immediately following the event on February 22:

- 1. The Ponderosa Lift Station overflowed and flow entered a tributary to Knights Creek.
- 2. The Mack Drive Lift Station overflowed and flow entered Two Mile Branch.
- The Dukes Bay sewer main was overloaded and wastewater exited a manhole at Tucker Road and an overflow entered Dukes Bay Canal, a tributary to Mud Creek.
- 4. A manhole overflowed on the Valdosta Country Club property. Flow entered Stillhouse Branch, a tributary to the Withlacoochee River.
- 5. A manhole overflowed for a short period at 817 Gornto Road. Flow entered the Municipal Separate Storm Sewer System (MS4).



The Withlacoochee River Water Pollution Control Plant suffered a washout of the biomass from the secondary treatment system due to high flows. This resulted in a high total suspended solids discharge on February 21, 22nd, 23rd, and 25th. Effluent total suspended solids from all four days were in excess of 1.5 times the weekly permitted discharge, meeting the definition of a major spill.

Date	Daily Flow (MGD)	TSS (mg/l)
February 21, 2008	7.7	94
February 22, 2008	15.5	417
February 23, 2008	15.2	471
February 25, 2008	16.4	83

The City of Valdosta and CDM are presently involved in an Inflow/Infiltration study. Flow monitors and rain gauges are in place and recorded this storm event. The results of this study will allow planning for upgrades and repairs to lessen future inflow and infiltration.

The City of Valdosta has reported the overflows and spills and has initiated upstream/downstream sampling of the receiving waters. As the river recedes, the City will repair the damaged manhole and any other parts of the system to minimize problems as much as possible now as we also proceed to complete the system evaluation and rehabilitation. The City has already set aside a GEFA Loan and funds from the present Special Purpose Local Option Sales Tax.

Please call Mr. John Waite, Environmental Manager if you need additional information.

Sincerely.

Leon V. Weeks Director of Utilities

CC: Mr. Larry Hanson

Seon V. Weeks



## CITY OF VALDOSTA, GEORGIA

JOHN L. WHITEHEAD, III
DEPUTY CITY MANAGER
OPERATIONS

Mr. Bill Noell Compliance and Enforcement Unit East Environmental Protection Division 4220 International Rarkway, Suite 101 Atlanta, GA 30354-3902

August 25, 2008

Dear Mr. Noell,

Over the period of August 22 through August 23, 2008 the Valdosta area was affected by Tropical Storm Fay. During this period the area received approximately eight inches of rain. Inflow and infiltration from this rain entered the sanitary sewer collection system causing high flows and resulting in six reportable incidents.

The Ponderosa Pump Station, located at 1001 Ponderosa Drive was overloaded and discharged raw sewage into a tributary to Knights Creek. The discharge is estimated to have been 24,000 gallons.

The Withlacoochee Treatment Plant, NPDES Permit # GA 0033235, received high influent flows which resulted in a hydraulic overload of the secondary treatment system and a discharge of activated sludge from the secondary clarifier blankets. This caused high total suspended solids in the plant effluent, meeting the definition of a "Major Spīll". On Friday August 22nd the total suspended solids result was 118 mg/l at a flow of 10.2 MGD. On Saturday August 23rd the total suspended solids result was 68 mg/l at a flow of 16.9 MGD. On Sunday August 24th the flow continued to be high at 17.7 MGD, however the effluent suspended solids concentration had dropped below permit limits.

The Big Country Club Pump Station at #2 Cherokee Drive was overloaded and discharged raw sewage. The discharge is estimated at 1,000 gallons. This discharge did not reach Waters of the State.

The manhole at the Rogers Street Pump Station discharged raw sewage at very low flow onto the ground. The discharge is estimated at 1,000 gallons. This did not reach Waters of the State.

A manhole located at 817 Gornto Road discharged approximately 5,000 gallons of raw sewage. This discharge did not reach Waters of the State.

Post Office Box 1125 \* 1917 Myrtle Street \* Valdosta, GA 31603-1125

Deputy City Manager Operations (229) 259-3585 \* Fax (229) 259-3598 \* jwhitehead@valdostacity.com

An Equal Opportunity Employer

A manhole located at 1404 N. Lee Street discharged approximately 8,000 gallons of raw sewage. This did not reach Waters of the State.

The City of Valdosta, in partnership with CDM, is currently drafting a Sanitary Sewer System Condition Assessment and Rehabilitation Program Plan which will identify immediate rehabilitation needs and develop a strategy for future assessment and rehabilitation. Flow monitoring information has been collected and project identification and prioritization are progressing.

Upstream and downstream sampling of the streams receiving major spills, Withlacoochee River and Knights Cteck, was initiated August 25, 2008

If you have any questions concerning this report please contact John Waite; Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Sincerely,

John L. Whitehead III

Deputy City Manager, Operations

John L. Whitehead, III

pw



## CITY OF VALDOSTA, GEORGIA

**Utilities Department** 

# STANDARD OPERATING PROCEDURE SANITARY SEWER OVERFLOWS

Henry Hicks
DIRECTOR OF UTILITIES

Upon identifying a release of sewage from the collection system the person finding the release will inform John Waite, Environmental Manager, at 229-292-0842.

The Environmental Manager or a delegated staff member will:

- 1. Record the time that the release was discovered and the location
- 2. Record the time that the release was reported
- 3. Proceed to the site to confirm the release and document necessary information

Once on site the Environmental Manager or his designee will:

- 1. Document the release with photographs
- 2. Estimate the rate of release
- 3. Follow the release stream to determine if sewage has reached the Waters of the State or is entering the Municipal Separate Storm Sewer System
- 4. Document any point of entry to state waters with photographs
- 5. Identify the point of entry to state waters as closely as possible
- 6. Inform the Director or Assistant Director of any entry into state waters

When the release has been stopped, the responding crew will inform the Environmental Manager of the time the release ended.

The Environmental Manager will question the responding crew and make on site observations to determine the cause of the release. Any physical indicators such as rags, grease, broken pipe, etc. will be documented with photographs.

The site of the spill will be then cleaned to remove any spilled debris, etc. and the site sanitized.

The Environmental Manager will compile the information to be used in public notices, press releases, and reports to the Environmental Protection Division. This information will be provided to the Director for submission. The Environmental Manager will be responsible for making the initial telephone or FAX report to EPD, and the initial report to the County Health Department. Up and down stream sampling will be initiated as required per EPD regulations.



Henry Hicks
DIRECTOR OF UTILITIES

July 29, 2010

Mr. Bill Noell
Compliance and Enforcement East
Georgia Department of Environmental Protection
Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Mud Creek WPCP Incident report

Dear Mr. Noell,

On July 23, 2010 part of the sludge within the secondary clarifiers at the Mud Creek WPCP came to the surface of the clarifiers. The plant staff used wash down hoses to break up the layer of solids and eventually brought the situation under control. However, the plant effluent became slightly turbid due to solids being washed over the secondary clarifier weirs.

In an effort to quantify the solids level in the effluent the plant staff started the effluent automatic sampler at 12:00 midnight and let it run until 7:00 am Saturday morning; a seven hour composite sample. On Monday morning the plant superintendent reported to John Waite, Environmental Manager, that the total suspended solids in this sample was over 100 mg/l. This would constitute a major spill if it was a normal twenty four hour composite. Mr. Waite was not sure if the seven hour composite taken on a day when effluent sampling does not normally occur would be considered a valid sample. Mr. Waite contacted EPD for guidance.

On Wednesday morning Mr. Waite received word that the release of solids would be considered a major spill. Mr. Waite then contacted the Mud Creek WPCP Superintendent to obtain the total suspended solids results from the seven hour composite and the total flow for the day in order to report the spill. During a review of the test results the plant staff discovered that a mistake had been made in the calculation, and that the actual result was 52 mg/l, which would not constitute a major spill.



The Mud Creek laboratory had retained part of the sample. Mr. Waite directed the remaining sample to be split between the two wastewater laboratories. The Mud Creek laboratory ran another TSS analysis. Mr. Waite took the remaining sample to the Withlacoochee plant and ran TSS on it there. The Mud Creek laboratory result was 45.5 mg/l. Mr. Waite's result was 58 mg/l. As a result the suspended solids level in the seven hour sample was not in excess of 1.5 times the seven day maximum allowed by the permit, and therefore a major spill did not occur. The City regrets the confusion caused by this error.

The City realizes that the composite sample collected over a period of only seven hours was not in accordance with the sampling requirements of the permit. The City will ensure that all staff involved in sampling at the treatment plants will receive additional training in proper sampling techniques to prevent a recurrence of this problem.

Sincerely,

Henry Hicks

Utilities Director

Henry Hicks
DIRECTOR OF UTILITIES

November 2, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Mud Creek Treatment Plant GA 0020222

Report of Permit Violation

Dear Mr. Noell,

On October 24, 2010 the Mud Creek Treatment Plant suffered a mechanical failure of the injector on the sulfur dioxide feed system. The facility also suffered several leaks in the re-use water feed system over the next few days. Due to these events it was necessary to stop chlorination of the effluent while repairs were made. Chlorine and sulfur dioxide feed systems were not operational from October 24, 2010 through October 28, 2010. Repairs have been completed and both systems were placed back into operation on October 29, 2010.

Since the disinfection system was not operational, the facility exceeded the weekly average for fecal coliform bacteria during the week of October 24<sup>th</sup>. The geometric mean of the two samples collected according to the normal schedule was 1158/100ml; the permit limit for weekly average is 400/100ml.



P.O. Box 1125 **1**016 Myrtle Street Valdosta, Georgia 31603-1125

Additional upstream and downstream sampling of Mud Creek was conducted during this time with the following results:

<u>Date</u>	<u>Upstream</u>	<u>Downstream</u>
10/25/10	397/100ml	520/100ml
10/26/10	580/100ml	: 367/100ml
10/27/10	190/100ml	417/100ml
10/28/10	253/100ml	527/100ml

The Mud Creek Treatment Plant is currently undergoing expansion. As a part of the expansion the chlorine disinfection system and sulfur dioxide de-chlorination system will be removed and replaced with ultraviolet disinfection. The ultraviolet disinfection system is expected to be operational in February 2011.

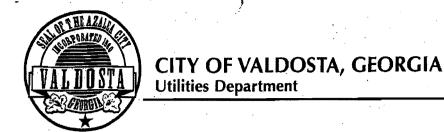
If you have any questions or require further information concerning this report, please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Hereif Herely

Henry Hicks

**Utilities Director** 



Henry Hicks
DIRECTOR OF UTILITIES

November 15, 2010

Mr. Bill Noell Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Mud Creek Treatment Plant GA 0020222 Report of Permit Violation

Dear Mr. Noell,

On November 8, 2010 the Mud Creek facility suffered the failure of one blower providing air to aeration basins, leaving the facility with a single blower in service. This resulted in DO's reaching lower levels in these basins causing the facility to exceed its weekly average for ammonia in the plant effluent (see levels below). Operational staff are currently adjusting air flows to basins to maintain maximum oxygen levels on a single blower. Sludge blankets have not risen in the clarifiers, keeping the facility in compliance with TSS limits for now. Two replacement blower motors have been ordered, and repairs should be completed on November 17, 2010.

Effluent ammonia nitrogen results for the week of November 7, 2010 are:

Date	Effluent Ammonia Concentration (mg/l)	
November 7, 2010	0.02	
November 9, 2010	0.2	
November 10, 2010	4.6	
November 11, 2010	5.9	



The average concentration for the week is 2.68 mg/l, which exceeds the permit limit of 2.25 mg/l.

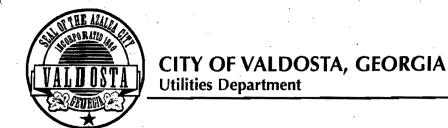
It is important to note that this facility is undergoing an expansion with the liquid treatment portion due for completion in early February of 2011. As part of this expansion, a completely new air handling system will be installed.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Sincerely,

Jenny Huter

Utilities Director



Henry Hicks
DIRECTOR OF UTILITIES

February 7, 2011

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Withlacoochee WPCP GA 0033235 Report of Major Spill

Dear Ms. Shahbazaz,

On February 5, 2011 the City of Valdosta wastewater collection system experienced inflow and infiltration from continuing rain in the area. This produced a high peak flow rate at the Withlacoochee WPCP of over 13 MGD. The Withlacoochee WPCP experienced a hydraulic overload of the secondary treatment system.

Due to the hydraulic overload the secondary clarifiers suffered hydraulic short circuiting with a resultant loss of solids. The total suspended solids result from the effluent composite sample for February 5, 2011 was 219 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit, constituting a major spill. The Environmental Protection Division was notified approximately 9:30 am Monday, February 07, 2011. All reporting and sampling requirements will be followed. The volume of the major spill will be the average daily flow for the facility; 9.1 MG.

In January 2010 the Utility Department finalized its Sanitary Sewer System Assessment and Capacity Analysis Report with recommendations for a long-term rehabilitation program of the sewer collection, pumping and treatment systems. The Utility Department will utilize this to plan to prioritize repairs, rehabilitation and upgrades to the entire sanitary sewer system over the next 20 to 30 years. As part of this long term plan, the City of Valdosta, has contracted for the design of a new force main, sewage pump stations, new receiving facility and equalization basin at the future Withlachoochee Wastewater Treatment Plant location to eliminate I&I associated with this facility's current 54-inch influent gravity main. In addition, the City is currently planning for the replacement of the Withlacoochee facility.



If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Sincerely,

Henry Hicks
Utilities Director

jpw

Henry Hicks
DIRECTOR OF UTILITIES

March 22, 2012

Ms. Marzieh Shahbazaz Compliance and Enforcement Unit East GA Environmental Protection Division Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Report of major spill

Dear Ms. Shahbazaz:

On the afternoon of March 14, 2012 Mr. Chad Harrison contacted the City Utilities Department concerning a sanitary sewer overflow at Sugar Creek in Valdosta. Mr. Harrison spoke with John Waite, Environmental Manager and reported that the overflow had occurred on March 3rd, during and after a major rain event. Mr. Harrison said that he had some video on his cellular phone. His concern was to have the overflow area cleaned.

On Thursday, March 15th Mr. Waite visited the site and confirmed that an overflow had occurred and that wastewater had entered waters of the state. The City is unable to determine the volume of the overflow, but from talking with Mr. Harrison and viewing the cell phone pictures, the City is convinced that the volume exceeded 10,000 gallons, constituting a major spill.

Cleanup operations were performed at the spill site on Monday, March 19th. The City was already sampling in the Withlacoochee River downstream of the convergence with Sugar Creek and Mr. Waite suggested this as a downstream sampling site. However, Ms. Hembree of EPD instructed the City that the upstream and downstream sampling sites must both be in Sugar Creek. This sampling was initiated on March 21st.

In January 2010, the Utility Department finalized its Sanitary Sewer System Assessment and Capacity Analysis Report with recommendations for a long-term rehabilitation program of the sewer collection, pumping and treatment systems. The Utility Department is utilizing this to plan to prioritize repairs, rehabilitation and upgrades to the entire sanitary sewer system over the next 20 to 30 years. As part of this long term plan, the City of Valdosta has completed 30% design of a new force main, sewage pump stations, new receiving facility and equalization basin at the future Withlacoochee Water Pollution Control Plant location. This should eliminate overflows in the Sugar Creek area due to surcharging of the Withlacoochee interceptor.



The Utilities Department has developed a manhole inspection process to identify manholes that are in need of rehabilitation and prioritize repairs. This process will be used to identify sources of inflow and infiltration in the Three Mile Branch sewershed. This will also reduce the likelihood of overflows in the Sugar Creek area.

Finally, the Utilities Department has added this manhole to the list of manholes that are monitored during and after major rain events to reduce the possibility of overflows going undetected in the future.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Respectfully,

Henry Hicks

Utilities Director

From: Sent: Henry Hicks

To:

Friday, June 24, 2011 3:36 PM 'kim\_hembree@dnr.state.ga.us'

Subject:

Valdosta activities to date on sewer issues

Attachments:

Valdosta Utilities Department Activities Related to Sewer System Issues.docx

Kim, it was a pleasure to speak to you this morning. Attached is a brief summary of our activities to date towards addressing past SSO's and associated problems in our sewer system. Please let me know if more details are required and I will provide them as quickly as possible. We have been actively pursuing a resolution to our claim with FEMA. Unfortunately, they are not as forthcoming in their response to us. As a result, we have had to take this claim to Washington DC to get some movement from FEMA in Region IV. Thanks for your consideration on this matter.

Henry

Henry Hicks Utility Director City of Valdosta



From:

Sent:

Henry Hicks Friday, July 27, 2012 9:20 AM 'Kim Hembree'

To:

Subject:

FW: photos primary clarifiers

Attachments:

clean primarys 009.jpg; clean primarys 001.jpg; clean primarys 002.jpg; clean primarys 008.jpg

Kim, just wanted to give you an update on the cleaning of the primary clarifiers at the Withlachoochee POTW. The contractor has finished cleaning of each and pictures are attached.

Henry

From: Eddie Black

**Sent:** Friday, July 27, 2012 8:10 AM

To: Henry Hicks

Subject: photos primary clarifiers

Image 001 is #1 primary, 002 is #2 primary, 008 is #3 primary and 009 is #4 primary.

Edward Black City of Valdosta Withlacoochee WPCP PO Box 1125 3352 Wetherington Ln. Valdosta Ga. 31602 eblack@valdostacity.com

From: Sent:

Henry Hicks

To:

Monday, August 20, 2012 2:20 PM 'Kim Hembree'

Subject:

Emailing: Condition&CriticalityFinalReporttoCityofValdosta.pdf Condition&CriticalityFinalReporttoCityofValdosta.pdf

Attachments:

The message is ready to be sent with the following file or link attachments:

 ${\tt Condition\&CriticalityFinalReporttoCityofValdosta.pdf}$ 

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

From:

Henry Hicks

Sent:

Monday, August 20, 2012 1:33 PM

To:

'Kim Hembree'

John Waite; John Whitehead III; Larry Hanson; Jason Scarpate

Cc: Subject: Attachments:

**FEMA Withlachoochee Documents** 

Condition&CriticalityFinalReporttoCityofValdosta 84.doc; Letter to Mayor John Gayle Valdosta Jan 11 2012.pdf; Valdosta Final Appeal Letter.pdf; EPD Response re

FEMA.docx

Kim, I believe I have attached all the documents requested in your email to John Waite regarding our efforts with FEMA as well as ongoing work and plans. Please look these over and let me know if you need anything else before I mail them to you. Thanks Henry

From: Sent: Henry Hicks

Monday, August 20, 2012 2:18 PM

To:

'Kim Hembree'

Subject:

RE: FEMA Withlachoochee Documents

For the most part it is valid. The one major change to it was we removed the CCTV and rehab of the 54-inch gravity main to the plant and replaced that work with the force main project. This was done for many reasons. First even if we fixed leaks in the main and manholes, there would still be inflow into the main throw the vent pipes and manhole covers all along the river whenever the River reaches flood stage. Because of this it cause backups in the collection system most notable at exit 18 and the Meadowbrook area. This also would not solve the problem at the influent pump station itself with regards to age, condition and its proneness to flooding events as is the remaining bottom third of the plant. Finally, the new headworks structure in the force main project will house bar screens and a grit removal system which had to be removed from the original pump station due to deterioration and in ability to do maintenance (confined space hazard). There are several other points that elude me right now, but the force main project was the first step toward relocation of the entire plant. I spoke with CDM on this over a year ago after the report was finalized as my concern was that their recommendation was only band aiding the problem not really fixing it. Other than that we are following the plan and have completed most if not all the Phase 1 projects. Hope this helps.

----Original Message----

From: Kim Hembree [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Monday, August 20, 2012 1:57 PM

To: Henry Hicks

Subject: Re: FEMA Withlachoochee Documents

Mr. Hicks,

I found a copy of the City of Valdosta's "Sewer System Modeling and Capacity Evaluation Report", January 2010 (Submitted by CDM). Is this document still valid? If so, does this document need updating to reflect any recent changes?

Thanks, -Kim

>>> Henry Hicks <hhicks@valdostacity.com> 8/20/2012 1:33 PM >>>

Kim, I believe I have attached all the documents requested in your email to John Waite regarding our efforts with FEMA as well as ongoing work and plans. Please look these over and let me know if you need anything else before I mail them to you. Thanks Henry

From: Sent: Henry Hicks

Sent:

Tuesday, August 28, 2012 6:35 AM

To:

'Kim Hembree'

Subject:

RE: Question regarding FEMA summary

The \$33 million project was included with the \$61 million plant relocation project (total \$94 million) on our first appeal in February 2011, and after our second and final appeal in February 2012, which was finally denied by FEMA well past the 90-day deadline for their final appeal response on July 27, 2012. In every instance FEMA did not respond as required by their own rules within the allotted time frames for their responses. This caused the city excessive delays in any attempt to move forward on any projects associated with our claims. If we moved forward on any project listed within the claim, that project would no longer be eligible for funding by FEMA. Hope this clarifies and answers your questions. This was definitely one of the most frustrating experiences with the federal government I have had in over 35-years of working in this field. Henry

----Original Message----

From: Kim Hembree [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Monday, August 27, 2012 5:27 PM

To: Henry Hicks

Subject: Question regarding FEMA summary

Mr. Hicks,

In your August 23, 2010 letter addressed to me, you stated that in 2010 a Hazard Mitigation Proposal for \$33 million was submitted to FEMA. In what month was this proposal submitted to FEMA and in what month and year did FEMA deny the proposal?

Thanks, -Kim

From: Sent:

Henry Hicks

Sent:

Wednesday, August 29, 2012 9:22 AM

To:

'Kim Hembree'

Subject:

RE: Question regarding FEMA summary

Kim, the Hazard Mitigation Plan (HMP) for the \$33 million wall around the bottom third of the treatment plant was submitted to FEMA on June 26, 2009. This HMP was then denied by FEMA on May 20, 2010. At this point we started working on our first appeal on total relocation of the plant (\$94 million). Sorry for any confusion. We have approximately 2,000 pages of documentation to go through covering the entire process. Henry

----Original Message----

From: Kim Hembree [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Tuesday, August 28, 2012 12:19 PM

To: Henry Hicks

Subject: RE: Question regarding FEMA summary

Your letter states that an initial proposal for \$33 million was submitted to FEMA in 2010 and denied. Then a revised proposal for \$94 million was submitted to FEMA in February 2011. Please see below:

"Following extensive meetings and correspondence with both FEMA and GEMA staff, the Hazard Mitigation Plan submitted to FEMA in 2010 as recommended by their field staff encompassed a \$33 million reinforced concrete wall around the bottom third of the plant to prevent future damage from flood events. The city had urged relocation of the entire facility to a higher elevation versus the wall but FEMA would not move on that recommendation. This \$33 million wall proposal was ultimately denied by the FEMA Region 4 Administrator as not cost effective."

"The city appealed this denial in February 2011 and submitted a revamped Hazard Mitigation Proposal to FEMA justifying \$94 million for the relocation of this treatment plant to a higher elevation..."

I need the date the original Hazard Mitigation Plan (the \$33 million plan) was submitted to FEMA and the date FEMA denied that original plan.

# >>> Henry Hicks <hhicks@valdostacity.com> 8/28/2012 6:35 AM >>>

The \$33 million project was included with the \$61 million plant relocation project (total \$94 million) on our first appeal in February 2011, and after our second and final appeal in February 2012, which was finally denied by FEMA well past the 90-day deadline for their final appeal response on July 27, 2012. In every instance FEMA did not respond as required by their own rules within the allotted time frames for their responses. This caused the city excessive delays in any attempt to move forward on any projects associated with our claims. If we moved forward on any project listed within the claim, that project would no longer be eligible for funding by FEMA. Hope this clarifies and answers your questions. This was definitely one of the most frustrating experiences with the federal government I have had in over 35-years of working in this field.

# Henry

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Sent: Monday, August 27, 2012 5:27 PM

To: Henry Hicks

Subject: Question regarding FEMA summary

Mr. Hicks,

In your August 23, 2010 letter addressed to me, you stated that in 2010 a Hazard Mitigation Proposal for \$33 million was submitted to FEMA. In what month was this proposal submitted to FEMA and in what month and year did FEMA deny the proposal?

Thanks, -Kim

From: Sent: Henry Hicks

Friday, September 21, 2012 12:25 PM

To: Subject: Attachments: 'Kim Hembree' RE: Inspection river 3.31.09 017.jpg

Kim, I have been out sick for most of the week and today is the first day back. Attached is a picture of the sign posted at the plants outfall. Over the past several years Eddie Black has held the position of Responsible Charge Operator. He was in this position when I came to work for the City. Once I became aware that he did not possess his Class 1 Operators License, I gave him a year to obtain it. This was also placed on his annual evaluation as a must do goal. He has taken the exam twice in that interim and failed both times by a couple of points. As a result Mitch Parker will be assuming this position effective immediately (Mitch holds a valid Class 1 Wastewater Operators license). In no way is this decision meant to disparage Eddie Blacks accomplishments or abilities as he has always been one of our most dedicated and effective supervisors with outstanding knowledge of this facility and its processes. During this time, I am amazed by his efforts to keep this facility in compliance and keep morale up under the conditions he is and has been faced with over the years. I believe Eddie's only problem is taking a written exam. Hope this answers your questions. Let me know if any additional information needed. Thanks Henry

----Original Message----

From: Kim Hembree [mailto:Kim.Hembree@dnr.state.ga.us]

Sent: Thursday, September 20, 2012 2:37 PM

To: Henry Hicks Subject: Inspection

Mr. Hicks,

I am working on completing the report for the inspection I performed at the Withlacoochee Plant in June and I have a few questions:

Who is/are the person(s) repsonsible for the daily operation of the Withlacoochee facility (also known as the Responsible Charge Operator)?

Does the facility have an outfall sign located at the effluent outfall at the Withlacoochee River? If so, what information is included on the sign? Is it possible to send me a picture of the outfall sign?

Thanks,
-Kim

Henry Hicks Monday, September 24, 2012 10:57 AM 'Kim Hembree' Outfall sign today 9 24 12 pics of outfall sign 004.jpg

From: Sent: To: Subject: Attachments:

Valdosta Utilities Department Activities Related to Sewer System Issues

The City of Valdosta Utilities Department has aggressively moved forward on implementation of our sewer system rehabilitation master plan and well as pursuing a formal response from FEMA Region IV on the relocation the Withlachoochee WPCP to higher ground.

#### Withlachoochee WPCP

City has submitted detailed Improved Project Document to FEMA justifying the relocation of the Withlachoochee WPCP to a higher location. Documentation submitted fully meets all FEMA requirements warranting this relocation, including BCA (benefit cost analyses) and prevailing laws. FEMA has yet to respond in any way and has exceeded its own 90-day response period. The city has submitted a letter to it Congressional Delegation in Washington DC at their staffs request to be submitted by the Congressional Delegation to FEMA Headquarters in order to get a formal response from Region IV. Without a response from Region IV, the city cannot move forward on its final appeal to FEMA Headquarters. The city has the full support of its Washington Congressional Delegation to get this project approved and fully funded.

In the interim, the City has purchased 70 acres of land approximately 54-feet higher than the existing facility. In addition, the Utilities Department has contracted with Parsons Group for the design of a new force main two pump stations, an equalization basin and new headworks structure with bar screens and grit removal system for construction on this site. The 30% design has been completed and a DDR and EID will be submitted to EPD for review and approval towards the end of July on this project. Once the DDR and EID are approved the Utility Department will move forward on 100% design, specifications and bid documents. The city has also contracted with a local property appraiser to start work on acquiring necessary easements for the force main and pump stations. This project is an interim measure until the full pant can be relocated. This project will allow for the abandonment of the 54-inch gravity main to the Withlachoochee WPCP that runs alongside the Withlachoochee River and is constantly prone to significant inflow during high river levels as well as ongoing infiltration of surface and ground water at normal times. In addition, the force main project will also allow for the abandonment of three large interceptors entering the 54-inch gravity main. This project will also allow for abandonment of the current influent pump station which is over 30-years old, under constant state of repair and prone to flooding as well. The total cost of this project is expected to be around 30 million dollars.

Over the past year, approximately \$800,000 has been expended at the Withlachoochee WPCP on equipment replacement to keep the facility fully functional and meeting permit requirements until relocation can be accomplished. The wetwell at the influent pump station was cleaned this year, old equipment removed and bypass pumping capabilities installed for this building for emergency purposes.

#### **Mud Creek WPCP**

Expansion of the wet treatment portions of this facility has been completed and started. Biosolids treatment portion and new Outfall are under construction with completion expected in February of

2012. The total cost of this project is expected to be about 40 million dollars and also include rehabilitation of the majority of the facilities in the old portion of the plant.

Cleaning and CCTV evaluation of the Mud Creek Interceptor has been completed and minor repairs associated with this evaluation will be undertaken upon completion of the cleaning and CCTV evaluation of the Knights Creek Interceptor later this summer.

#### **Sewer Collection System**

Last year a FOG Prevention Ordinance was adopted and submitted to EPD. This program has significantly reduce SSO's associated with fats, oils or grease blockages.

The Utility Department has contracted for the replacement of four lift station (Ponderosa, Big Country Club, Eastwind and Mack Drive) this year. Construction will begin once control panels are delivered and be completed within 180 days of delivery. As part of this work implementation of SCADA will take place for all lift stations. Funding is being sought to complete the replacement of ten remaining lift stations.

The Department has also contracted for the replacement or rehabilitation of 20 serious deteriorated manholes located in problem areas. This contract will be the first phase of multiple annual contracts for manhole rehabilitation funded at approximately 1.0 million dollars per year.

We anticipate adoption of a Standards and Specifications with Details Document later this year. This document will be the standard for all future water and sewer infrastructure construction.

A (CMMS) Computerized Maintenance Management Software system is in the process of being implemented for all water and sewer divisions and operations. To date the Water Plant, Withlachoochee and Lift Station facilities have been completed. Mud Creek Plant is next followed by Warehouse, then Distribution and Collection system, followed with Meter Read division, Industrial Compliane and FOG programs.

A consultant will be selected later this summer to perform a complete and comprehensive water and sewer rate study and make recommendations to ensure that both short and long term rehabilitation and capital plans are fully funded.

#### Summary -

Over the last two years and within next three years the City of Valdosta has or is in the process of completing over \$144,000,000 in sewer system related projects. This total does not include funding for the relocation of the Withlachoochee WPCP or additional I&I work planned for subsequent years.

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# March 16, 2011

Jean Brown, Environmental Specialist EPD, Watershed Protection Branch 4220 International Parkway, Suite 101 Atlanta, Georgia 30354

RE: Request for Variance under Provisions of O.C.G.A 12-7-6 (15)

Mud Creek WPCP Outfall Pipe, Lowndes County

Please find the attached published public advisory as required. We have received no comments regarding this public notice. If you have any questions please let me know.

Respectfully,

Henry Hicks Utilities Director City of Valdosta December 13, 2011

Mr. Dan Abrams
Environmental Engineer, Engineering & Technical Support
Environmental Protection Division, Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

RE: Withlachoochee WPCP EID Request for Additional Information

Mr. Abrams:

Attached are the additional documents you requested in your letter dated October 5, 2011, EPD # 2011-171. If there is any other information necessary for approval of our DDR and EID, please let me know as soon as possible. We would like to start moving forward to 100% design. Thank you for your assistance and consideration I this matter.

Sincerely,

Henry Hicks Utilities Director City of Valdosta

Cc: John Machisko, Parsons
Jason Scarpate, City of Valdosta

December 13, 2011

Mr. Dan Abrams
Environmental Engineer, Engineering & Technical Support
Environmental Protection Division, Water Protection Branch
4220 International Parkway, Suite 101
Atlanta, GA 30354

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Sincerely,

Henry Hicks Utilities Director City of Valdosta

Cc: John Machisko, Parsons
Jason Scarpate, City of Valdosta

# STANDARD OPERATING PROCEDURE SANITARY SEWER OVERFLOWS

Upon identifying a release of sewage from the collection system the person finding the release will inform John Waite, Environmental Manager, at 229-292-0842.

The Environmental Manager or a delegated staff member will:

- 1. Record the time that the release was discovered and the location
- 2. Record the time that the release was reported
- 3. Proceed to the site to confirm the release and document necessary information

Once on site the Environmental Manager or his designee will:

- 1. Document the release with photographs
- 2. Estimate the rate of release
- 3. Follow the release stream to determine if sewage has reached the Waters of the State or is entering the Municipal Separate Storm Sewer System
- 4. Document any point of entry to state waters with photographs
- 5. Identify the point of entry to state waters as closely as possible
- 6. Inform the Director or Assistant Director of any entry into state waters

When the release has been stopped, the responding crew will inform the Environmental Manager of the time the release ended.

The Environmental Manager will question the responding crew and make on site observations to determine the cause of the release. Any physical indicators such as rags, grease, broken pipe, etc. will be documented with photographs.

The site of the spill will be then cleaned to remove any spilled debris, etc. and the site sanitized.

The Environmental Manager will compile the information to be used in public notices, press releases, and reports to the Environmental Protection Division. This information will be provided to the Director for submission. The Environmental Manager will be responsible for making the initial telephone or FAX report to EPD, and the initial report to the County Health Department. Up and down stream sampling will be initiated as required per EPD regulations.

In the early morning hours of Monday, December 7, 2009, three main manholes and associated underground piping receiving all sewage from the Mud Creek Wastewater Treatment Facility sewer collection service area failed just prior to the facility's main pump station. Local contractors were contacted immediately to assist the City staff in repairs. It is anticipated that these repairs will take several days to complete. Facility staff has placed temporary pump systems in place to maintain ongoing treatment operations at the facility. However, this temporary system is not capable of handling high flows associated with heavy rains and sewer surcharges have and might continue to occur in low areas of the sewer collection system for this facility during rain events. Between late Wednesday and early Thursday approximately 0.5 million gallons of sewage surcharged in a low area between Highway 41 South and Perimeter Road, and the sewage entered waters of the state, specifically Mud Creek. This constitutes a major spill and upstream and downstream sampling has been initiated as required by the Environmental Protection Division (EPD). Additional sewage spills might occur in this area if significant rain is received until repairs at the facility are completed. The problem has affected the influent pumps at the Mud Creek WPCP and on the morning of December 11, the pumping capacity of the facility was reduced to approximately 2 million gallons per day while pump repairs are being made. Pump repairs are underway at this time. The City has contacted an outside firm to supply a pump around system capable of completely isolating the influent pump station so that more wastewater can be supplied to the treatment facility and repairs to the station and manholes can be completed. For further information contact John Waite at 259-3592.

On February 5, 2010, a Major Spill was recorded at the Mud Creek Wastewater Treatment Plant located at 1638 New Statenville Road, Valdosta, GA. This spill started at 1:30 PM and was brought under control by 5:00 PM on this date. The spill resulted in approximately 231,000 of sewage to be pumped on the ground at this facility of which some entered Mud Creek which is considered a water of the state.

The cause of the spill occurred during ongoing repairs to clogged pumps and check valves in the main influent pump station which was being bypassed to allow repairs to take place. One of the plugs in the east bypassed line failed causing the main station wet well to filled with wastewater. Wastewater from the wet well began entering the dry well portion of the station where the repairs were being made, making it necessary to stop repairs and evacuate the dry well for the safety of personnel. Wastewater was pumped from the station onto the ground for 3.5 hours in an attempt to replace the plug and continue repairs safely. Once another plug can be safely installed on the east bypass line and the pump station can be emptied to allow safe access to the dry well and repairs resumed. Recurring blockages in the check valves at this main pump station have continued to slow repairs. These ongoing blockages are attributed to significant amounts of dirt and debris build up in the main pipeline which resulted form the main influent manhole collapse in early December of 2009. As there is no way to remove this debris directly from this line, facility staff are preparing a plan to gradually fill this line without allowing debris and dirt to flow back into the check valves.

Once all repairs are successfully completed the pump station will be returned to full operation and the use of bypass pump systems discontinued.

EPD has been notified of this event and up and down stream sampling site has been initiated. Residents should avoid contact with the water in Mud Creek between Inner Perimeter Road and Mud Creek at Johnston Road

For further information contact John P. Waite, Environmental Manager at 229-259-3592.

On April 22, 2010, the Withlacoochee River Water Pollution Control Plant suffered a biological upset of it's secondary treatment processes which resulted in the loss of sludge blankets from this processes clarifiers. The total suspended solids measured in the effluent composite sample for April 22, 2010, was 144 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 5.9 million gallons, which equals the twenty four hour discharge flow of the plant for this period.

The biological upset may have been caused by a chemical waste hauler discharging at the Withlacoochee Plant. The hauling company has been informed that further deliveries will not be accepted until a full determination of the cause of the upset has been made.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

On February 10, 2011, the Withlacoochee River Water Pollution Control Plant experienced high flows due to inflow and infiltration caused by area rain. The high flow resulted in a hydraulic overload of the secondary treatment process and in the loss of sludge blankets from the process clarifiers. The total suspended solids measured in the effluent composite sample for February 10, 2011, was 92 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 10.3 million gallons, which equals the twenty four hour discharge flow of the plant for this period.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

To address this ongoing inflow and Infiltration (I&I) problem, the City of Valdosta, has contracted for the design of a new force main, sewage pump stations, new receiving facility and equalization basin at the future Withlachoochee Wastewater Treatment Plant location to eliminate I&I associated with this facility's current 54-inch influent gravity main.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

On February 19, 2011, the Withlacoochee River Water Pollution Control Plant experienced a discharge of a portion of the secondary sludge blankets due to mechanical failure of two of three secondary sludge pumps. The total suspended solids measured in the effluent composite sample for February 19, 2011, was 72 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 6.825 million gallons, which equals the twenty four hour discharge flow of the plant for this period.

Both the failed secondary sludge pumps are in the process of being repaired with one being returned on February 22<sup>nd</sup>. A new third sludge pump has been ordered for backup purposes. The City has purchased a Computer Maintenance Management System (CMMS) to facilitate improved maintenance and repair of the mechanical assets within the system. Implementation of the CMMS is ongoing. In addition, the City is currently planning for the replacement of the Withlacoochee facility.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

On February 5, 2011, the Withlacoochee River Water Pollution Control Plant experienced high flows due to inflow and infiltration caused by area rain. The high flow resulted in a hydraulic overload of the secondary treatment process and in the loss of sludge blankets from the process clarifiers. The total suspended solids measured in the effluent composite sample for February 5, 2011, was 219 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 9.1 million gallons, which equals the twenty four hour discharge flow of the plant for this period.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

To address this ongoing inflow and Infiltration (I&I) problem, the City of Valdosta, has contracted for the design of a new force main, sewage pump stations, new receiving facility and equalization basin at the future Withlachoochee Wastewater Treatment Plant location to eliminate I&I associated with this facility's current 54-inch influent gravity main.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

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Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

Sementha Mathews
Public Information Officer
City of Valdosta
P.O. Box 1125
Valdosta, GA 31603
(229) 259-3548



To sign up for e-news and stay informed of the news and events taking place in the city, visit <a href="https://www.valdostacity.com/publicinformation">www.valdostacity.com/publicinformation</a>

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amendment; we do not accept liability for any such changes, or for their
consequences. The integrity and security of this message cannot be guaranteed on the Internet.

#### **Henry Hicks**

From: Sent: Henry Hicks

Sent: .To: Tuesday, February 22, 2011 2:07 PM

John Waite

Subject:

FW: Public Notice--Withlacoochee WPCP

Finally got an approval

From: Sementha Mathews

**Sent:** Tuesday, February 22, 2011 2:06 PM **Subject:** Public Notice--Withlacoochee WPCP

#### FOR IMMEDIATE RELEASE:

February 22, 2011

Release #: 02-11-13

### **Public Notice**

On Feb. 19, 2011, the Withlacoochee River Water Pollution Control Plant experienced a discharge of a portion of the secondary sludge blankets due to mechanical failure of two of three secondary sludge pumps. The total suspended solids measured in the effluent composite sample for Feb. 19, was 72 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 6.825 million gallons, which equals the 24- hour discharge flow of the plant for this period.

Both of the failed secondary sludge pumps are in the process of being repaired, with one being returned on Feb. 22. A new third sludge pump has been ordered for backup purposes. The city has purchased a Computer Maintenance Management System (CMMS) to facilitate improved maintenance and repair of the mechanical assets within the system. Implementation of the CMMS is ongoing. In addition, the city is currently planning for the replacement of the Withlacoochee facility.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

If you have any questions concerning this report please contact Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com.

-end-

### Press Release and Public Notice

On February 5, 2011, the Withlacoochee River Water Pollution Control Plant experienced high flows due to inflow and infiltration caused by area rain. The high flow resulted in a hydraulic overload of the secondary treatment process and in the loss of sludge blankets from the process clarifiers. The total suspended solids measured in the effluent composite sample for February 5, 2011, was 219 mg/l. This is greater than 1.5 times the seven day maximum allowed by permit and as such constitutes a major spill. The volume of this major spill is 9.1 million gallons, which equals the twenty four hour discharge flow of the plant for this period.

Upstream and downstream sampling of the Withlacoochee River has been initiated and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

To address this ongoing inflow and Infiltration (I&I) problem, the City of Valdosta, has contracted for the design of a new force main, sewage pump stations, new receiving facility and equalization basin at the future Withlachoochee Wastewater Treatment Plant location to eliminate I&I associated with this facility's current 54-inch influent gravity main.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="www.iwaite@valdostacity.com">wwite@valdostacity.com</a>

### Press Release and Public Notice

On February 7, 2011, a collapsed sewer manhole at the edge of Country Club Road near Williamsburg Drive caused a blockage and overflow of wastewater into Three Mile Branch. A temporary bypass pumping system has been installed and the overflow was stopped at 12:40 pm. An estimated total of 187,660 gallons of untreated wastewater was discharged to Three Mile Branch.

Country Club Drive has been closed between Greenmeadow Drive and North Valdosta Road to allow repair of the collapsed sewer, and will remain closed until the repair is complete.

The public is advised to refrain from any contact with the waters of Three Mile Branch downstream (west) of Country Club Drive for the next seven days.

Upstream and downstream sampling of Three Mile Branch will begin on February 8<sup>th</sup>, and a stream monitoring report will be forwarded to the Georgia Environmental Protection Department (EPD) following the first seven days of monitoring.

If you have any questions concerning this report please contact John Waite, Environmental Manager, at 229-259-3592 or jwaite@valdostacity.com

The Utilities Department has developed a manhole inspection process to identify manholes that are in need of rehabilitation and prioritize repairs. This process will be used to identify sources of inflow and infiltration in the Three Mile Branch sewershed. This will also reduce the likelihood of overflows in the Sugar Creek area.

Finally, the Utilities Department has added this manhole to the list of manholes that are monitored during and after major rain events to reduce the possibility of overflows going undetected in the future.

If you have any questions concerning this notice please contact John Waite, Environmental Manager, at 229-259-3592 or <a href="mailto:jwaite@valdostacity.com">jwaite@valdostacity.com</a>

Respectfully,

Henry Hicks Utilities Director

#### **Henry Hicks**

From: Sent:

Henry Hicks

Monday, July 16, 2012 8:43 AM

To:

John Waite

Subject:

FW: Minor Sewer Overflow Near Sugar Creek

Revise EPD letter to coincide with this adding last statement as well

From: Shemeeka Johnson

Sent: Friday, July 13, 2012 4:47 PM

To: Sementha Mathews

Subject: Minor Sewer Overflow Near Sugar Creek

### For Immediate Release Release #: 07-12-08

July 13, 2012

### Minor Sewer Overflow Near Sugar Creek

On July 11, 2012 the Valdosta area received over two inches of rain in less than an hour from strong storms moving through the area. Infiltration and inflow of this rainfall into the sanitary sewer system increased the amount of combined wastewater and stormwater being collected and ultimately treated by the Withlacoochee Water Pollution Control Plant.

On July 12, Utility Department staff conducting an afternoon field inspection of the collection system in the Meadowbrook Drive area found evidence of a minor sanitary sewer overflow on Meadowbrook Drive near Sugar Creek. The overflow was not active at the time of discovery. The volume of this minor spill is unknown, but indications at the location show it to be very small.

Since the overflow was discovered at a point within 100 feet of Sugar Creek, there is a possibility that some of the overflow entered the creek behind Meadowbrook Drive. Signs warning of the spill have been placed at the spill location and downstream public access points. The area of the spill will be cleaned and treated with a bleach solution for disinfection.

As a result there is a possibility of increased levels of bacteria associated with the spill and as a precaution the public should avoid contact with Sugar Creek downstream of the spill location. Please direct and questions concerning this spill to Environmental Manager John Waite at (229) 259-3592 or jwaite@valdostacity.com.

The Utility Department is currently in the bidding process for CCTV televising of specific areas in the sewer collection system flowing into the Meadowbrook sewer interceptor. These areas have been identified as those with the highest probability of inflow and infiltration into the system. Once video of these lines is completed the appropriate method of repairs can be determined and then made to prevent further overflows at this location. The Utility Department is committed to taking measures to eliminate or minimize overflows and to protect the environment.

-end-



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 2 3 2012

## CERTIFIED MAIL 7012 1010 0001 8097 0689 RETURN RECEIPT REQUESTED

City of Valdosta Attn: Mr. Larry H. Hanson City Manager 216 East Central Avenue P.O. Box 1125 Valdosta, Georgia 31603-1125

Re: Information Request – Section 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit Nos. GA0033235 and GA0020222
Withlacoochee River Wastewater Treatment Plant and Mud Creek Wastewater Treatment Plant

Dear Mr. Hanson:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency, Region 4 hereby requests the City of Valdosta (the City) to provide the information set forth in Enclosure A regarding the wastewater treatment plants noted above and their associated sanitary sewer collection systems. The City is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Mr. David Phillips, Enforcement Officer U.S. Environmental Protection Agency, Region 4 Clean Water Enforcement Branch 61 Forsyth Street, S.W. Atlanta, Georgia 30303-8960

The City's response to this information request should specifically reference the particular section and number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible City of Valdosta official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic) which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place, as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch at the U.S. EPA, Region 4.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

Also enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet*, which may assist you in understanding the compliance assistance resources and tools available. However, any decision to seek compliance assistance at this time does not relieve the City of its obligations to the EPA or the State of Georgia, does not create any new rights or defenses, and will not affect the EPA's decision to pursue enforcement action.

Please feel free to contact Mr. David Phillips, Enforcement Officer at (404) 562-9773 or by email at phillips.david@epa.gov, if you have questions regarding this notice and information request.

Sincerely,

Denisse D. Diaz, Chief

Clean Water Enforcement Branch

Water Protection Division

**Enclosures** 

cc: Ms. Jane Hendricks

Georgia Environmental Protection Division

Mr. Sheldon Irvin Valdosta, Georgia

#### **ENCLOSURE A**

## SSO PROGRAM City of Valdosta, GA

## 1. Provide the following:

- a. The size of the City of Valdosta's Sanitary Sewer Collection System (SSS) (linear feet or miles);
- b. A list of the pump stations in the SSS, including size (gpm), and indicate if back up power is available and if it is adequate to fully operate the pump station;
- c. A list of all constructed overflow points (any unpermitted constructed discharge points) in the SSS (including pump stations) prior to the headworks of the City of Valdosta's WWTPs;
- d. The average design flow of the City of Valdosta's WWTPs;
- e. The peak design flow of the City of Valdosta's WWTPs;
- f. The annual average flow of the City of Valdosta's WWTPs; and
- g. The population served by the City of Valdosta's WWTPs and their respective SSSs.
- 2. For purposes of this Information Request, a sanitary sewer overflow (SSO) is an overflow, spill, release, or diversion of wastewater from the SSS. SSOs include overflows or releases of wastewater that reach waters of the United States (U.S.); overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO.

Provide a listing of all SSOs that occurred from September 2007 to the present. For each SSO provide the following:

- Date(s) of the SSO;
- b. Time (and Date if other than a. above) when the City of Valdosta was notified that the SSO event occurred;
- c. Time (and Date if other than a. above) when the City of Valdosta (or contractor) crew responded to the SSO;
- d. Time (and Date if other than a. above) when the SSO ceased;
- e. Time (and Date if other than a. above) when corrective action was completed;
- f. Location of the SSO, including source (pump station, manhole, etc.);
- g. Ultimate destination of the SSO, such as surface waterbody (by name, if available), storm drain leading to surface waterbody (by name, if available), dry land, building, etc.;
- h. Volume of the SSO:
- i. Cause of the SSO such as grease, roots, other blockages, wet weather (infiltration and inflow), loss of power at pump station, pump failure, etc.;
- j. Corrective actions taken to stop the SSO; and
- k. Corrective actions taken to prevent this or similar SSOs in the future.

If available, please provide the above information in a Microsoft compatible spreadsheet format.

3. If the City of Valdosta has a formal written plan for responding to, addressing, and reporting

SSOs (i.e., a Sewer Overflow Response Plan ("SORP")), provide a copy of the plan.

- 4. Provide a copy of any additional City of Valdosta procedures not included in the SORP (as referenced in Question 3 above) for the following activities:
  - a. Documenting SSOs;
  - b. Estimating SSO volume;
  - c. Identifying root causes of SSOs;
  - d. Containment and clean-up of SSOs, including any specific procedures addressing backups into buildings caused by mainline problems;
  - e. Identifying wet weather related SSOs and reconnaissance of these during rain events; and
  - f. All reporting of SSOs to the permitting authority, the State of Georgia.
- 5. Provide the name of the person (or position title) responsible for each of the activities indentified in the City of Valdosta's SORP and/or listed in Question 4 above.

#### **ENCLOSURE B**

## RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS (40 C.F.R. Part 2)

Ex cept for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). Method and time of asserting business confidentiality claim. A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.

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### Phillips, David

From:

Horsey, Maurice

Sent:

Monday, September 17, 2012 3:00 PM

To:

Phillips, David Ammons, Brad

Cc: Subject:

Fw: City of Valdosta

fyi

Maurice L. Horsey, IV | Chief Municipal & Industrial Enforcement Section Clean Water Enforcement Branch U.S. Environmental Protection Agency | Region IV Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

#### "CONFIDENTIALITY NOTICE"

This message is intended exclusively for the individual(s) of entity(s) to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

---- Forwarded by Maurice Horsey/R4/USEPA/US on 09/17/2012 02:59 PM -----

From:

"Marzieh Shahbazaz" <Marzieh.Shahbazaz@dnr.state.ga.us>

To:

Maurice Horsey/R4/USEPA/US@EPA

Cc:

"Kim Hembree" <Kim.Hembree@dnr.state.ga.us>

Date:

09/17/2012 01:33 PM

Subject:

City of Valdosta

Please see attached files: a summary of the City's violations and list of spills. please feel free to call me at 404-675-1684 if you have any questions. thanks





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### Summary City of Valdosta

## Withlacoochee Water Pollution Control Plant NPDES Permit No. GA0033235 and Mud Creek Water Pollution Control Plant (WPCP) NPDES Permit No. GA0020222

#### SPILLS

 The City of Valdosta (City) experienced twenty six minor spills and thirty five major spills, from their sanitary sewer system to waters of the State from January 2007 to August 2012 (see Attachment A). The City reported a fish kill downstream of the November 18, 2009 minor spill.

#### MAJOR OUTFALL SPILLS

- The City experienced twenty seven outfall spills from the WPCP effluent outfall in January 2007 to August 2012 (see Attachment B).
- Chapter 391-3-6-.05 of the Georgia Rules and Regulations for Water Quality Control defines an outfall spill as "The discharge of pollutants into the waters of the State by a POTW that exceeds the weekly average permitted effluent limit for biochemical oxygen demand (5-day) or total suspended solids by 50 percent or greater for any one day."

#### PERMIT EFFLUENT LIMITATION VIOALTIONS

- The Mud Creek WPCP has experienced seven permit effluent limitation violations from January 2009 to July 2012.
- The Withlacoochee WPCP has experienced fourteen permit effluent limitation violations from January 2009 to July 2012.

#### INSPECTIONS

- On June 20, 2012 representatives of EPD performed a Compliance Evaluation Inspection (CEI) of the Withlacoochee Water Pollution Control Plant (NPDES Permit No. GA0033235). During the CEI, EPD representatives observed the following: all barscreens and grit removal systems out of service; excessive raw sewage solids and sludge buildup in preliminary treatment area; evidence of sludge throughout the waste stream; improperly maintained effluent flow measuring device; improperly maintained composite sampling equipment; and improperly maintained laboratory records for regulatory reporting.
- On June 21, 2012 representatives of EPD performed a Compliance Evaluation Inspection (CEI) of the Mud Creek Water Pollution Control Plant (NPDES Permit No. GA0020222). During the CEI, EPD representatives observed the following: improperly maintained tubing to composite samplers; pinfloc in secondary clarifiers; and a damaged effluent outfall sign.

#### **FÉMA HISTORY**

- According to the City, a portion of the Withlacoochee Water Pollution Control Plant (WPCP) experienced damage during the floods of March and April 2009, which was declared a Federal Disaster by the President of the United States on April 9, 2009. The Withlacoochee WPCP was rendered completely inoperable due to the flood event.
- Following the flooding of the Withlacoochee WPCP, the City applied for funding by FEMA, while performing necessary repairs to bring the WPCP back to pre-flood conditions.
- In June 26, 2009, the City submitted a Hazard Mitigation Plan (HMP) to FEMA.
   The HMP included a \$33 million reinforced concrete wall around the WPCP to prevent future damage from flood events.
- In May 20, 2010 FEMA denied the HMP.
- In February 2011, the City appealed FEMA's denial of the HMP and submitted a revised HMP for \$94 million to relocate the WPCP to a higher elevation.
- In February 2012, FEMA denied the revised HMP and the City appealed the denial.
- On July 27, 2012, FEMA denied the City's final appeal of the HMP.

#### FACILITY HISTORY

- On December 7, 2009 the Mud Creek WPCP main manhole collapsed along with associated piping, and an estimated 5,500,000 gallons of raw sewage spilled into Mud Creek from December 8, 2009 to December 13, 2009.
- On January 5, 2010 the City and EPD met, via teleconference, to discuss concerns with the City's sanitary sewer collection system.
- In January 2010 the City submitted to EPD a <u>Sanitary Sewer Condition</u>
   Assessment and Rehabilitation Program Plan Condition and Criticality Report
   (Criticality Report) and a <u>Sewer System Modeling and Capacity Evaluation</u>
   Report (Sewer Evaluation). Both identify approximately \$190 million in rehabilitation and repairs without the inclusion of a new Withlacoochee WPCP.
- On April 6, 2010 Representatives of the City and EPD met, via teleconference, to clarify certain portions of Criticality Report and Sewer Evaluation Report, and to request the City to submit updated schedules for completion of specific sewer system projects
- On April 21, 2010, at the request of the City, representatives of the City and EPD met to further discuss corrective actions to address the City's sanitary

sewer system, the amount of work the City has already completed with regard to its sewer system, and the City's commitment to continue to address its sanitary sewer system.

- In April 2010 the City adopted a FOG ordinance.
- In April 2010, the City's utility department began budgeting for the 20-year implementation of the Criticality Report.
- On May 6, 2012 the City submitted a report to EPD which included schedules for identified projects to reduce sanitary sewer overflows.
- In April 2012 the City completed a \$40 million expansion at the Mud Creek WPCP.
- The City did not act on many rehabilitation projects at the WPCP due to the ongoing negotiations with FEMA, because, according to the City, implementing certain projects would render the City ineligible for expected FEMA funding.
- The City has recognized that deficiencies exist within its sanitary sewer collection system and contends it has progressively adopted a capital improvement program implementation schedule which identifies projects and funding sources to address those deficiencies.

#### **ENFORCEMENT HISTORY**

- On August 27, 1998 the City of Valdosta was issued Expedited Enforcement Compliance Order No. PCEP-98-073 for an unpermitted discharge which resulted in a water quality violation for fecal coliform in State Waters.
- On August 3, 2005 Consent Order No. EPD-WQ-4459 (CO) was executed between the City and EPD to address deficiencies with the City's biosolids land application program and violations of the City's approved Sludge Management Plan.

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## Attachment A

# City of Valdosta Spills

## January 2007 to August 2012

BEGIN_DATE	WATERWAY_IMPACTED ==	OVERFLOW_LOCATION	QUANTITY	CAUSE_COMMENT.
2007-01-27	KNIGHTS CREEK	2015 EAST PARK AVENUE	14000	MECHANICAL FAILURE @ LIFT STATION
2007-03-09	KNIGHTS CREEK	LAKELAND HIGHWAY	7000	BAD PUMPS IN LIFT STATION
2007-04-18	DUKES BAY CANAL	758 SOUTH TROUP STREET	5300	STOPPED MAIN
2008-02-21	DUKES BAY CANAL TRIB TO MUD CREEK	108 TUCKER ROAD	18000	HEAVY RAINFALL
2008-02-21	KNIGHTS CREEK	1001 PONDEROSA DRIVE	22000	HEAVY RAINFALL
2008-02-21	STILLHOUSE BRANCH TRIB TO WITHLACOOCHEE RIVER	3500 COUNTY CLUB ROAD	6000	HEAVY RAINFALL
2008-02-21	TRIBUTARY TO JOREE MILL POND TO TWO MILE BRANCH	817 GORNTO ROAD	6000	HEAVY RAIN, PRESSURE ALSO CAUSED FAILURE TO PREVIOUS SEWER REPAIR
2008-02-22	TWO MILE BRANCH	608 HOWELL BROOK DRIVE	35000	OVERLOAD DURING HEAVY RAIN
2008-08-23	KNIGHTS CREEK	1001 PONDEROSA DRIVE	24000	INFLOW
2008-11-30	WITHALOOCHEE RIVER	HIGHWAY 133 @ I-75 EXIT 18	135000	HEAVY RAINFALL
2009-02-19	TRIBUTARY TO CHERRY CREEK	LAKE LAURIE DRIVE	500	SANITARY OVERFLOW/ ELECTRICAL PUMP FAILURE
2009-04-03	ONE MILE BRANCH	1212 WAINWRIGHT DRIVE @ OLD SUGAR CREEK WWTP	10001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2310 PARK LANE	10001	EXCESSIVE RAIN
2009-04-03	SUGAR CREEK	2408 MEADOWBROOK DRIVE	10001	EXCESSIVE RAIN

	reserving in the state of the s			
2009-08-13	SUGAR CREEK	1314 BAYTREE ROAD	18900	MANHOLE FALLEN INTO STREAM
2009-08-18	UNNAMED TRIBUTARY	KINDERLOU LIFT STATION	5500	ELECTRICAL- DUE TO SCADA FAILURE
2009-08-26	DUKES BAY CANAL	210 DAMPIER STREET	3000	GREASE BLOCKAGE
2009-11-11	SUGAR GREEK	1825 NORMAN DRIVE	14000	BLOCKAGE OF GREASE AND RAGS
2009-11-18	ONE MILE BRANCH	1409 NORTH ASHLEY STREET	7500	STROM WATER PIPE BROKE SEWER LINE
2009-12-02	SUGAR CREEK	1825 NORMAN DRIVE	6000	BLOCKAGE IN MAIN
2009-12-02	TWO MILE BRANCH	2408 NORTH PATTERSON	9000	GREASE BLOCKAGE
2009-12-03	SUGAR CREEK	1815 NORMAN DRIVE	9999	BLOCKAGE AND EXCESSIVE RAIN
2009-12-08	MUD CREEK	1638 NEW STATENVILLE ROAD	550000	COLLAPSED MANHOLE
2009-12-09	MUD CREEK	1638 NEW STATENVILLE ROAD	1150000	COLLAPSED MANHOLE/EXCESSIVE RAIN/CLOGGED PUMPS
2009-12-10	MUD CREEK	1638 NEW STATENVILLE ROAD	1150000	COLLAPSED MANHOLE/HEAVY RAINS/CLOGGED PUMPS
2009-12-11	MUD CREEK	1638 NEW STATENVILLE ROAD	1350000	DAMAGED MANHOLES
2009-12-12	MUD CREEK	1638 NEW STATENVILLE ROAD	950000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-13	MUD CREEK	1638 NEW STATENVILLE ROAD	350000	COLLAPSED MANHOLE/PUMP FAILURE
2009-12-22	SUGAR CREEK	1825 NORMAN DRIVE	14000	GREASE AND RAGS
2010-01-21	DUKES BAY CANAL	400 SOUTH OAK STREET	6000	I&I, HEAVY RAIN
2010-01-21	DUKES BAY CANAL	700 ROGERS STREET	600	I&I, HEAVY RAIN
2010-01-21	SUGAR CREEK	2408 MEADOWBROOK DRIVE	450000	I&I, HEAVY RAIN

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2010-01-21	STREAM	700 CYPRESS STREET	64000	I&I, HEAVY RAIN
		* .		
2010-01-21	TRIBUTARY TO KNIGHTS CREEK	1001 PONDEROSA DRIVE	12100	I&I, HEAVY RAIN
	TRIBUTARY TO TWO MILE	Account of the second of the s		
2010-01-21	BRANCH	817 GORNTO ROAD	20350	I&I, HEAVY RAINS
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2010-01-21	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	138000	I&I, HEAVY RAIN
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2010-01-25	DUKES BAY CANAL	701 CYPRESS STREET	34000	MANHOLE COLLAPSED
recerence				
2010-04-04	TWO MILE BRANCH	2408 NORTH PATTERSON STREET	4000	GREASE BLOCKAGE
***************************************				
2010-04-18	TRIBUTARY TO KNIGHTS CREEK	1201 PONDEROSA DRIVE	500	GREASE BLOCKAGE
	,			
2010-04-29	DUKES BAY CANAL	TUCKER ROAD	3000	LINE BLOCKAGE
			*	
2010-06-14	DUKES BAY CANAL	613 SOUTH PATTERSON STREET	3240	BROKEN PIPE
2010-09-27	ONE MILE BRANCH	212 EAST COLLEGE STREET	1100	181 .
2010 00 20	ONE NAME DRANGE	242 FACT COLLEGE CEREET	6000	19 L DUIS TO SVOSSGIVE DAIN
2010-09-29	ONE MILE BRANCH	212 EAST COLLEGE STREET	6000	I&I DUE TO EXCESSIVE RAIN
2010 00 20	CLICAD CDEEK	1422 CORNTO BOAD	75000	18 I DI IE TO EVERCEIVE DAIN
2010-09-29	SUGAR CREEK	1423 GORNTO ROAD	/5000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	. 40000	I&I DUE TO EXCESSIVE RAIN
2010-09-29	SUGAR CREEK	2408 MEADOWBROOK DRIVE	46000	INI DUE TO EXCESSIVE RAIN
2010-09-29	TRIBUTARY TO KNIGHTS CREEK	1003 PONDEROSA DRIVE		I&I DUE TO EXCESSIVE RAIN
2010-03-23	TRIBUTANT TO KINIGHTS CREEK	TOOS FOINDENOSA DRIVE	27000	INI DOL TO EXCESSIVE NAIN
2010-09-29	TWO MILE BRANCH	2422 MEADOWBROOK DRIVE	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	I&I DUE TO EXCESSIVE RAIN
2010-03-23	1 WO WILL DIVANCE	2-722 WEADOWDROOK DRIVE	45000	TOUR TO EXCESSIVE NAME
2011-01-18	TRIBUTARY TO CHERRY CREEK	4036 BEMISS ROAD	27000	GREASE BLOCKAGE
COLL OF TO	TINDOTANT TO CHEMIT CHEEK	TOUC DE MINUS NORD	27000	
2011-02-07	THREE MILE BRANCH	825 NORTHWOOD PARK DRIVE	187660	COLLAPSED SEWER
		2501 NORTH PATTERSON STREET		
2011-10-12	TWO MILE BRANCH	@ PENDLETON DRIVE	500	GREASE BLOCKAGE
			500	

gallerik (der vorder virgen) in der eine einer der zweite gestelligt der setze verbeite der verb		1307 NORTH SAINT AUGUSTINE		The second secon
2011-10-13	TRIBUTARY TO LAKE SHERI	ROAD	4600	RAG BLOCKAGE
-	The state of the s			
2011-11-29	SPRINGHOUSE CREEK	3350 PLANTATION DRIVE	9000	BYPASS PUMP HOSE CONNECTION FAILURE
	AND THE STATE OF T	4119 BEMISS ROAD		
2012-03-03	CHERRY CREEK	BEMISS ROAD PUMP STATION	24000	PUMP STATION OVERLOADED BY HEAVY RAINS
,				
2012-03-03	SUGAR CREEK	2412 MEADOWBROOK DRIVE	12000	Hydraulic overload
-				
2012-03-08	TRIBUTARY TO KNIGHTS CREEK	301 SOUTH BLANCHARD STREET	189000	COLLAPSED SEWER MAIN .
2012-06-05	TWO MILE BRANCH	NORTH ASHLEY STREET	1800	SEWER BROKEN BY CONTRACTOR
TO THE PROPERTY OF THE PROPERT		* .		
2012-06-26	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2000	EXCESSIVE RAIN FROM TROPICAL STORM DEBBY
	*			
2012-07-11	SUGAR CREEK	2412 MEADOWBROOK DRIVE	1000	EXCESSIVE RAIN
	0.1500, 00554		1000	
2012-08-07	CHERRY CREEK	4119 BEMISS ROAD	1000	LEAKING PUMP
2012 00 16	CHCAD CDEEK	2412 145 1 0 0 1 1 0 0 0 1 0 0 1 1 5	2500000	DOTH BURADS AT BURAD STATION SAUSED
2012-08-16	SUGAR CREEK	2412 MEADOWBROOK DRIVE	2500000	BOTH PUMPS AT PUMP STATION FAILED
2012 00 15	144TH 4 00 00 HEE 00 455	FWT 10 O HIGHWAY 100	25000'00	
2012-08-16	WITHLACOOCHEE RIVER	EXIT 18 @ HIGHWAY 133	2500000	PUMP STATION FAILURE

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## Attachment B

## City of Valdosta Major Outfall Spills

## January 2007 to August 2012

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BEGIN_DATE	WATERWAY_IMPACTED	OVERFLOW_LOCATION	QUANTITY	CAUSE_COMMENT
2007-02-01	MUD CREEK	1638 NEW STATENVILLE ROAD	3600000	HIGH FLOWS AT WPCP DUE TO HEAVY RAIN (3")
2007-02-14	MUD CREEK	1638 NEW STATENVILLE ROAD	3000000	TWO SECONDARY CLARIFIERS OUT OF SERVICE FOR REPAIR
2007-02-15	MUD CREEK	1638 NEW STATENVILLE ROAD	2700000	TWO SECONDARY CLARIFIERS OUT OF SERVICE FOR REPAIR
2007-10-18	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6300000	SECONDARY CLARIFIER OUT OF SERVICE
2008-01-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6500000	HYDRAULIC OVERLOAD, CAUSED BY RAIN
2008-02-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	7700000	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2008-02-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15500000	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2008-02-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15200000	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2008-02-25	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16400000	HEAVY RAIN, I/I DURING WEEK OF 2/18-22/08, 8" RAIN, 5" on 2/21 and 2" on 2/22
2008-04-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10600000	HEAVY RAIN CAUSE HIGH PEAK FLOW LEADING TO HYDRAULIC OVERLOAD OF SECONDARY CLARIFIERS
2008-08-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10200000	HYDRAULIC OVERLOAD
2008-08-23	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	16900000	HYDRAULIC OVERLOAD
2008-08-26	MUD CREEK	1638 NEW STATENVILLE ROAD	6300000	SOLIDS WASHED OUT FROM TROPICAL STORM FAY
2008-11-29	WITHALOOCHEE RIVER	3352 WETHERINGRON LANE	6500000	I&I, HEAVY RAINFALL

•	•			
2009-01-27	MUD CREEK	1638 NEW STATENVILLE ROAD	2700000	CLOGGED ACTIVATED SLUDGE TUBES
2009-03-31	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8800000	HIGH SOLIDS OF EFFLUENT FLOW AND EXCESSIVE RAIN
2009-04-01	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	18300000	EXCESSIVE RAIN
2009-04-02	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	24800000	FLOODING
2010-01-21	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	15400000	I&I, HEAVY RAIN
2010-01-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	14900000	INFLOW FROM HEAVY RAIN
2010-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12000000	INFLOW FROM HEAVY RAIN
2010-03-11	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	12200000	INFLOW FROM HEAVY RAIN
2010-04-22	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	5900000	BIOLOGICAL UPSET OF SECONDARY TREATMENT SYSTEM
2011-02-05	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	9100000	RAIN INDUCED, HYDRAULIC PROBLEM AT PLANT
2011-02-10	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	10300000	HYDRAULIC OVERLOAD
2011-02-19	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	6825000	MECHANICAL FAILURE
2012-03-03	WITHLACOOCHEE RIVER	3352 WETHERINGTON LANE	8380000	HYDRAULIC OVERLOAD OF WPCP SECONDARY SYSTEM

#### Phillips, David

From:

Horsey, Maurice

Sent:

Wednesday, September 12, 2012 1:05 PM

To:

Phillips, David

Subject:

Fw: SSO National Enforcement Initiative - Georgia

fyi

Maurice L. Horsey, IV | Chief

Municipal & Industrial Enforcement Section

Clean Water Enforcement Branch

U.S. Environmental Protection Agency | Region IV

Direct: 404.562.9764 | Fax: 404.562.9729

horsey.maurice@epa.gov | www.epa.gov

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---- Forwarded by Maurice Horsey/R4/USEPA/US on 09/12/2012 01:05 PM -----

From:

"Marzieh Shahbazaz" <Marzieh.Shahbazaz@dnr.state.ga.us>

To: Cc: "Jane Hendricks" <Jane.Hendricks@dnr.state.ga.us>, Maurice Horsey/R4/USEPA/US@EPA "Kim Hembree" <Kim.Hembree@dnr.state.ga.us>, Brad Ammons/R4/USEPA/US@EPA, Ken

Kwan/R4/USEPA/US@EPA

Date:

09/12/2012 12:58 PM

Subject:

Re: SSO National Enforcement Initiative - Georgia

Maurice, please find the attached summary for SSOs and compliance history for the city of Milledgeville. we are working on Valdosta, our database has a problem and we need to run a report for the final check, we will Email you their: SSO, compliance history, GAEPD enforcement actions history, and our inspection report not later than next Monday. please feel free to call me at 404-675-1684 if you have any questions. thanks

>>> Maurice Horsey <Horsey.Maurice@epamail.epa.gov> 8/16/2012 7:24 AM >>>

#### Dear Jane:

EPA continues to work in implementing the Municipal Infrastructure National Enforcement Initiative (NEI), including addressing Sanitary Sewer Overflows (SSOs). As an action in implementing the Municipal Infrastructure NEI for SSOs, Region 4 has selected the following cities/utilities for investigation. As a part of this investigation, we

will soon issue §308 information requests to these municipal utilities.

Milledgeville, City of Valdosta, City of

If you have any information, including SSO data, as well as any enforcement actions that GAEPD considers as an addressing action for these municipalities, please let me know. As a reminder, for an action to be considered as an "addressing action," it must meet one of the following criteria:

- a. Federal Enforcement Actions
- i. Federal civil judicial complaint filed with or without a companion consent decree.
- ii. Federal final administrative penalty order (APO) issued.
  - iii. Federal administrative order issued (administrative compliance order (AOC) or consent agreement and final order (CAFO)).
  - b. No Further Action No further federal action warranted at this time for one of the following reasons:
- i. State equivalent of filed judicial complaints or final issued administrative orders.
- ii. State or federal NPDES permits with compliance schedules

that comport with the Star Kist See In re Star Kist Caribe,

Inc.,

3 E.A.D. 172 (CJO 1990), aff'd (EAB 1992, Order Denying Modification Request); In re Star Kist Caribe, Inc., 2 E.A.D.

758

schedules for the WQBELs (derived from an LTCP) and referred to above, because the statutory deadlines for compliance with most WQS for controlling CSO discharges (e.g. odor, floatables, fecal coliform, and color) have passed and may not be extended through the issuance of a NPDES permit. standard for use of compliance schedules in permits that will result in compliance with the CWA and elimination of illegal raw sewage discharges from CSSs

iii. The CSS/SSS/MS4 has no violations or minor violations

of

its NPDES permit upon inspection/investigation or returns to compliance in a timely manner on its own, or after an informal response or compliance assistance.

c. Provide Permit Feedback - Regional enforcement staff will notify EPA permitting staff in writing if they encounter permit issues that require attention prior to permit reissuance. (The level of detail included in this documentation of permit concerns should take into consideration when and how that information

becomes part of the administrative record for permit proceedings.).

Please provide any SSO information and/or addressing actions to me and/or Brad Ammons (ammons.brad@epa.gov) within 30 days.

Thanks

Municipal & Industrial Enforcement Section Clean Water Enforcement Branch U.S. Environmental Protection Agency | Region IV Direct: 404.562.9764 | Fax: 404.562.9729 horsey.maurice@epa.gov | www.epa.gov

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